ENSV FY07
Inspection Transmittal Form

Todays Date: 9/10/2007

INSPECTION ACTIVITY

Media	Type of Inspection	Selection Criteria	Compliance Officer	Inspection Date
RCRA Contractor	CEI	High VOC Emitting Facilities	Buckner, E	**05/17/2007**

Inspector	Activity #
TTE	

FACILITY INFORMATION

Facility Name	ID Number	NAICS/SIC Code
Industrial Laminates	IAD073489288	32613

Address	City	County	State	ZIP
665 Lybrand	Postville	Allamaker	IA	52132

Facility Activity

INSPECTION FINDINGS

NOV/NOPF Issued? (●) Yes ( ) No ( ) N/A **Potential SNC?** ( ) Yes (●) No ( ) N/A

Preliminary Findings (briefly list regulatory deficiencies)

1. Failure to label containers of universal waste lamps as "universal waste-lamps", "waste lamps", or "used lamps" as required by 40 CFR 273.14(e).
2. Failure to keep containers of universal waste lamps closed as required by 40 CFR 273.13(d)(l).

0021

MULTIMEDIA FINDINGS

MM Participating Program* ____ MM Level ____ MM Type ____ Potential EJ? ( ) Yes (●) No ( ) N/A

MM Screening completed? (●) Yes ( ) No ( ) N/A SBREFA handout provided? (●) Yes ( ) No ( ) N/A

If yes, was MM Screening Checklist forwarded? (●) Yes ( ) No

* A=CAA, W=CWA, R=RCRA, E/T=EPCRA/TSCA, U=UST, C=CFC, S=SPCC, U-I=UIC, Wet., PWS, All, EMS = EMS

If yes, who? > ☐ CAA ☑ EPCRA/TSCA ☐ SPCC ☐ CWA ☑ UST ☐ PWS ☐ UIC ☐ Wetlands ☐ RCRA ☑ CFC ☐ EJ ☐ All

EMS? ( ) Yes (●) No **EMS ISO 14001 certified?** ( ) Yes (●) No

Inspector Worksheet - ENSV FY07
Inspection Transmittal Form

Todays Date: 2/16/2007

INSPECTION ACTIVITY

Media	Type of Inspection	Selection Criteria	Compliance Officer	Inspection Date
RCRA Contractor	CEI	High VOC Emitting Facilities	Buckner, E	05/17/07

Inspector	Activity #
TTE	

FACILITY INFORMATION

Facility Name	ID Number	NAICS/SIC Code
Industrial Laminates	IAD073489288	32613

Address	City	County	State	ZIP
665 Lybrand	Postville	Allamakee	IA	52132

Facility Activity

INSPECTION FINDINGS

NOV/NOPF Issued? (X) Yes ( ) No ( ) N/A Potential SNC? ( ) Yes (X) No ( ) N/A

Preliminary Findings (briefly list regulatory deficiencies)

1. Failure to label containers of universal waste lamps as "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps" as required by 40 CFR 273.14(e).
2. Failure to keep containers of universal waste lamps closed as required by 40CFR 273.13(d)(1).

MULTIMEDIA FINDINGS

MM Participating Program*	MM Level	MM Type

Potential EJ? ( ) Yes (X) No ( ) N/A

MM Screening completed? (X) Yes ( ) No ( ) N/A

SBREFA handout provided? (X) Yes ( ) No ( ) N/A

If yes, was MM Screening Checklist forwarded? (X) Yes ( ) No

If yes, who? > [ ] CAA [X] EPCRA/TSCA [ ] SPCC [ ] CWA [X] UST [ ] PWS [ ] UIC [ ] Wetlands [ ] RCRA [X] CFC [ ] EJ [ ] All

* A=CAA, W=CWA, R=RCRA, E/T=EPCRA/TSCA, U=UST, C=CFC, S=SPCC, U-I=UIC, Wet., PWS, All, EMS

EMS? ( ) Yes (X) No EMS ISO 14001 ( ) Yes (X) No

QUALITY OF INSPECTION TARGET

Do you feel this facility was well targeted and worth inspecting? (briefly explain why or why not)

REPORT OF RCRA COMPLIANCE INSPECTION

At

INDUSTRIAL LAMINATES/NORPLEX INC.
665 Lybrand Street
Postville, Iowa 52162
(563) 864-4227

EPA ID Number: IAD073489288

On

May 17, 2007

By

TETRA TECH EM INC.

For

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Environmental Services Division

INTRODUCTION

At the request of the Environmental Services Division and the Air and Waste Management Division of the U.S. Environmental Protection Agency (EPA) Region 7, Tetra Tech EM Inc. (Tetra Tech), conducted a hazardous waste compliance evaluation inspection (CEI) at Industrial Laminates/Norplex Inc. (ILNorplex), located at 665 Lybrand Street, Postville, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. As requested by the EPA compliance officer for the facility, the CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements. This report and attachments present the results of the RCRA CEI. Tetra Tech also conducted a Level B multimedia screening inspection at ILNorplex. The Multimedia Screening Checklist is included as Attachment 1.

PARTICIPANTS

ILNorplex:

Scott Loven, Health, Safety, and Environmental Manager, (563) 864-4227

Tetra Tech:

Ann Y. Galbraith, Environmental Engineer, (816) 412-1756

INSPECTION PROCEDURES

Prior to the CEI, I conducted a drive-by inspection. I did not observe any areas of concern during the drive-by. I went to the facility lobby and informed the receptionist that I was there to conduct a CEI. The receptionist called Mr. Scott Loven to meet me. Mr. Loven met me in the lobby and I presented my business card and EPA credentials letter. Mr. Loven directed me to his office. I explained the procedures for the CEI and the facility's right to make confidentiality claims. I provided Mr. Loven the Confidentiality Notice (Notice) and asked him to read the Notice. I stated that at the conclusion of the inspection he would be given an opportunity to make or not make a claim of confidentiality. I also provided Mr. Loven a copy of U.S. Federal Code 1001 and 1002, which he read concerning communication/conveyance of false statements and documents to federal inspectors.

I reviewed the RCRA Info Data Verification Handler Information Report with Mr. Loven and made changes based on the information he provided: I added used oil generator to the type of regulated activity (see Attachment 2). Mr. Loven acted as the primary facility representative for the inspection. During the CEI, my discussions with Mr. Loven focused on facility operations and processes, wastes generated, and waste management practices. I conducted a visual inspection of the facility, accompanied by Mr. Loven. I also conducted a review of the facility's records, including manifests with land disposal restriction (LDR) notices, bills of lading for nonhazardous waste, shipping records for universal waste, training documentation, material safety data sheets (MSDS), inspection records, and the facility contingency plan. Facility information gathered during the inspection is documented on the Data Gathering Worksheets and Checklists (see Attachment 3).

During the exit briefing at the conclusion of the CEI, I summarized my findings to Mr. Loven. I provided Mr. Loven a Receipt For Documents and Samples, which he signed acknowledging receipt (see Attachment 4). I also provided Mr. Loven the Notice, which he signed to indicate no confidential business information (CBI) was provided (see Attachment 5). I then provided Mr. Loven a Notice of Preliminary Findings (NOPF) that he signed to acknowledge receipt (see Attachment 6). I also provided

Mr. Loven copies of business outreach information provided by EPA. A copy of the facility site plan was obtained during the CEI (see Attachment 7). Photographs taken during the inspection are in Attachment 8.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

According to Mr. Loven, ILNorplex began operating at this location in 1974. ILNorplex manufactures industrial laminates. Major raw materials used by the facility include resins and solvents. According to Mr. Loven, the ILNorplex facility is approximately 130,000 square feet under one roof, and the property encompasses 22 acres (see Attachment 7). ILNorplex currently has 180 employees, both full- and part-time, working three 8-hour shifts, Monday through Friday.

ILNorplex manufactures a variety of industrial-grade laminates. Paper, cotton cloth, or glass cloth are used as base materials to produce a laminated product. The raw material is impregnated with a phenolic or epoxy resin and placed into a drip pan. The material is then placed into an oven for curing, cut into product-specific sizes, and placed into a press. ILNorplex uses a mixture of solvents for cleaning at the process lines. The mixture of solvent can vary, depending on the type of resin to be cleaned. Solvents that may be part of the mixture include xylene, toluene, and acetone. The spent solvent and resin is managed as hazardous waste (D001, F003, F005). Other hazardous wastes generated from the process line include cleanup rags and melamine water. ILNorplex uses product knowledge and testing to determine appropriate waste codes for each waste stream.

Certain solvent and resin mixtures from the laminate process line are placed into the facility's solvent distillation unit. Solvents used for general facility cleaning are also placed in the distillation unit. According to Mr. Loven, the same type of solvent mixtures used at the laminate process line is used for general facility cleaning. According to Mr. Loven, the melamine water is managed separately from other resin wastes because the water content is too high to process through the on-site distillation unit. Still bottoms from the solvent distillation unit are managed as hazardous waste (D001, F003, F005). The facility uses product knowledge and testing to determine waste codes for the still bottoms.

The facility also generates hazardous waste from performing corrective action for contaminated groundwater. According to Mr. Loven, groundwater beneath the facility became contaminated with

solvents during the time that the facility was operated by Allied Signal. The facility uses testing to determine appropriate waste codes for this waste stream (D001, D007, D008, F003, F005).

The following waste streams are also generated at the ILNorplex facility: spent parts washer solvent, universal waste lamps, used oil, an oil-water mixture, and general facility trash. The generation process and management of each waste stream are described in Section 4 of this report. Based on information obtained prior to the CEI and during discussions with Mr. Loven, I inspected ILNorplex as a large quantity generator (LQG), generating greater than 1,000 kilograms (kg) of hazardous waste (D001, F003, F005) per month, a used oil generator, and a small quantity handler of universal waste (does not accumulate 5,000 kg or more of universal waste at any time).

2. Areas Visually Inspected

During the visual inspection, I was accompanied by Mr. Loven. The visual inspection included four less-than-90 day hazardous waste storage areas, the universal waste lamp storage area, and the used oil storage area.

The visual inspection began at the laminate process line. I observed a less-than-90-day hazardous waste storage area (see Attachment 7, Area #1) containing one 55-gallon container of waste cleanup rags (D001, F003, F005) dated May 11, 2007, and one 55-gallon container of melamine scrap (D001, F003, F005) dated May 16, 2007. The containers were in good condition, labeled as hazardous waste, and closed. They had been in storage for less than 90 days. According to Mr. Loven, melamine scrap is solvent with melamine resin that contains too many solids to go to the facility distillation unit. Melamine scrap is combined with other resin scrap (epoxy scrap, phenolic scrap) as the components of spent solvent and resin waste shipped off site for fuel blending. Mr. Loven stated that melamine wash is solvent with melamine resin that can be distilled. ILNorplex keeps these wastes segregated and processes the melamine wash through the facility distillation unit along with other resin wash (epoxy wash and phenolic wash). Mr. Loven stated that when operators get a full container at the laminate process line less-than-90-day hazardous waste storage area, they move the container to the less-than-90-day hazardous waste storage area in the still room (see Attachment 7, Area #2).

I next inspected the still room. I observed the still room less-than-90-day hazardous waste storage area adjacent to the facility distillation unit. I observed three 55-gallon containers of epoxy wash and five 55-gallon containers of phenolic wash to be processed through the distillation unit. I also observed one 55-gallon container of epoxy scrap and one 55-gallon container of still bottoms to be shipped off site for

fuel blending. I also observed one 55-gallon container of solvent rags that was approximately ¼ full (see Attachment 8, Photographs 1 and 2). All of the containers were closed, labeled as hazardous waste, in good condition, and dated. The oldest container observed was dated April 13, 2007 and the newest container observed was dated May 15, 2007. According to Mr. Loven, the distillation unit is a batch operation with a 55-gallon capacity and ILNorplex runs the unit every 2 to 3 days. I also observed four 55-gallon containers of hazardous waste on a pallet and banded together. Mr. Loven stated that they were ready to be moved to the outside less-than-90-day hazardous waste storage area (see Attachment 7, Area #3). The containers were closed, labeled as hazardous waste, in good condition, and dated between April 23 and May 8, 2007.

I next inspected the outside less-than-90-day hazardous waste storage area. I observed 18 pallets with four 55-gallon containers each (see Attachment 8, Photograph 3). The oldest container was dated March 21, 2007. All containers were closed, in good condition, and labeled hazardous waste. According to Mr. Loven, ILNorplex generates approximately 80 55-gallon containers of hazardous waste per month. ILNorplex ships hazardous waste monthly. Mr. Loven stated that ILNorplex also generates contaminated groundwater from a groundwater remediation system. The groundwater at the ILNorplex facility had been contaminated by a solvent release from an underground storage tank (UST) in the 1980s. Mr. Loven stated that the UST had been closed in place in approximately 1987. I observed three 275-gallon containers of contaminated groundwater, the oldest dated April 30, 2007. The contaminated groundwater containers were closed, in good condition, and labeled hazardous waste.

I next proceeded back inside the building and inspected the fourth less-than-90-day hazardous waste storage area (see Attachment 7, Area #4). I observed two 55-gallon containers in this area outside the laminate process line. Both containers were closed, in good condition, dated less than 90 days, and labeled as hazardous waste. One container was identified as anhydride waste and the other as epoxy wash. According to Mr. Loven, the anhydride waste is another resin and solvent waste combination with high solids from the laminating process. The anhydride waste will be combined with other resin scrap for disposal by fuel blending.

I next inspected the boiler room accompanied by Mr. Loven (see Attachment 7). In the boiler room, I observed one 30-gallon parts washer. Mr. Loven stated that the parts washer is serviced by Safety-Kleen. I also observed a 1,500-gallon used oil aboveground storage tank (AST). Mr. Loven stated that Safety-Kleen takes the used oil as well. The tank was labeled "Used Oil." I also observed a 55-gallon container of used oil adjacent to the AST, with four used oil filters on top. According to Mr. Loven,

ILNorplex hot drains the used oil filters, then crushes the filters and collects them in a 55-gallon container. Once full, the container of crushed filters is picked up by Safety-Kleen for recycling.

Also in the boiler room, I observed universal waste lamp storage. I observed five containers of various sizes of waste fluorescent lamps, both silver-tipped and green-tipped. According to Mr. Loven, ILNorplex manages all spent lamps as universal waste. Four containers of universal waste lamps were not closed and none of the five containers was labeled (see Attachment 8, Photographs 4 and 5). ILNorplex failed to keep four containers of universal waste lamps closed as required by 40 Code of Federal Regulations (CFR) 273.13(d)(1) (**NOPF No. 1**). ILNorplex also failed to label five containers of universal waste lamps as "Universal Waste—Lamps," "Waste Lamps," or "Used Lamps" as required by 40 CFR 273.14(e) (**NOPF No. 2**). I indicated the universal waste storage requirements to Mr. Loven and he stated that he would have the universal waste lamp storage corrected. According to Mr. Loven, storage for less than one year is verified by the documentation for the previous off-site shipment. Following the review of facility documentation, I went back to the universal waste lamp storage area and observed the containers closed and labeled (see Attachment 8, Photographs 6 and 7).

3. RCRA Status

ILNorplex is identified as a large quantity generator (LQG) on the RCRA Info Data Verification Handler Report provided by EPA (see Attachment 2). Based on review of current operations, manifests and other documentation, and information provided by Mr. Loven, I verified that the average monthly generation rate of hazardous waste for ILNorplex places the facility solidly in the category of a LQG, generating greater than 1,000 kilograms (kg), or 2,200 pounds of hazardous waste per month. ILNorplex is a used oil generator and a small quantity handler of universal waste as well. ILNorplex generates an average of 39,000 pounds of hazardous waste (D001, F003, F005) per month.

4. Wastes Generated On Site

The following table describes significant waste streams currently generated at the facility.

#	Name	Generating Process	Hazardous Determination	Estimated Generation Rate	On-site Management	Off-site Management
1	Spent Solvent and Resin	Spent solvent and resin is generated from cleaning dip pans in the laminate process line and general cleaning throughout the facility. Components include melamine wash, epoxy wash, and phenolic wash.	The spent solvent and resin waste is considered hazardous (D001, F003, F005) based on process knowledge.	Approximately 300 gallons per month	The spent solvent and resin waste is stored in 55-gallon containers in the process line and still room less-than-90-day hazardous waste storage areas. The spent solvent and resin waste is then processed through the on-site solvent distillation unit.	Still bottoms from the distillation unit are sent for disposal as hazardous waste (see Item 2).
2	Still Bottoms	Still bottoms are generated from distillation of spent solvent in the facility distillation unit.	The facility considers still bottoms hazardous (D001, F003, F005) based on process knowledge and testing (reviewed waste profile).	Approximately 375 pounds per month	The still bottoms are collected in a 55-gallon hazardous waste storage container in the still room less-than-90-day hazardous waste storage area.	The still bottoms are transported by Pioneer Tank Lines to Systech Environmental Corporation in Fredonia, Kansas, for fuel blending.
3	Spent Solvent and Resin	Spent solvent and resin are generated from cleaning dip pans with solvent. This is the portion of the solvent and resin waste with too many solids to process through the distillation unit. Components of this waste include melamine scrap, epoxy scrap, phenolic scrap, and anhydride waste.	The facility considers the spent solvent and resin hazardous (D001, F003, F005) based on process knowledge and testing (reviewed waste profile).	Approximately 30,000 pounds per month	The spent solvent and resin waste is collected in 55-gallon storage containers in facility less-than-90-day hazardous waste storage areas.	The spent solvent and resin waste is transported by Pioneer Tank Lines to Systech Environmental Corporation in Fredonia, Kansas, for fuel blending.

#	Name	Generating Process	Hazardous Determination	Estimated Generation Rate	On-site Management	Off-site Management
4	Cleanup Rags	Cleanup rags are generated from use of rags to clean dip pans and from general facility cleaning.	The facility considers cleanup rags hazardous (D001, F003, F005) based on process knowledge and testing (reviewed waste profile).	Approximately 30 to 55 gallons per month	Cleanup rags are collected in 55-gallon storage containers in the process line less-than-90-day hazardous waste storage area. Full containers are moved to the outside less-than-90-day hazardous waste storage area.	Cleanup rags are transported by Pioneer Tank Lines to Systech Environmental Corporation in Fredonia, Kansas, for fuel blending.
5	Melamine Water	Melamine water is generated from process wastewater with melamine-based resin.	Melamine water is considered hazardous (D001, F003, F005) based on product knowledge and testing (reviewed waste profile).	Approximately 4,500 pounds per month	Melamine water is collected in 55-gallon storage containers in a less-than-90-day hazardous waste storage area.	Melamine water is transported by Pioneer Tank Lines to Systech Environmental Corporation in Fredonia, Kansas, for fuel blending.
6	Contaminated Groundwater	Contaminated groundwater is generated from extraction of solvent-contaminated groundwater during corrective action at the facility.	Contaminated groundwater is considered hazardous (D001, D007, D008, F003, F005) based on process knowledge and testing (analytical report).	Approximately 500 gallons per month	Contaminated groundwater is collected in 275-gallon plastic containers in the outside less-than-90-day hazardous waste storage area.	Contaminated groundwater is transported by Veolia ES Industrial Services to Veolia ES Technical Solutions in Ohio for aggregation prior to disposal.
7	Spent Parts Washer Solvent	Spent parts washer solvent is generated from service of the maintenance parts washer unit.	Spent parts washer solvent is considered hazardous (D039) based on Safety-Kleen waste profile for recycled solvent.	Approximately 25 gallons every 16 weeks	Parts washer solvent remains in the parts washer unit until serviced by Safety-Kleen every 16 weeks.	Spent parts washer solvent is transported by Safety-Kleen to the Safety-Kleen facility in La Crosse, Wisconsin, for recycling.

#	Name	Generating Process	Hazardous Determination	Estimated Generation Rate	On-site Management	Off-site Management
8.	Spent Lamps	Spent lamps are generated from maintenance to replace spent lamps throughout the facility, and are a mixture of spent low mercury vapor lamps and spent conventional lamps.	Universal waste.	Approximately 150 lamps per year	Spent universal waste lamps are collected in cardboard containers in the boiler room.	Spent universal waste lamps are picked up by Retrofit Recycling approximately once a year for recycling.
Facility failed to label five containers of universal waste lamps as "Universal Waste—Lamps," "Waste Lamps," or "Used Lamps," as required by 40 CFR 273.14(e) (**NOPF No. 1**). Facility failed to keep four containers of universal waste lamps closed as required b 40 CFR 273.13(d)(1) (**NOPF No.2**).						
9.	Used Oil	Used oil is generated from maintenance of the press machines	Used oil is considered nonhazardous based on product knowledge and testing (reviewed waste profile).	Approximately 1,500 gallons per year	The used oil is collected in a 1,500-gallon aboveground storage tank in the boiler room.	Used oil is picked up by Safety-Kleen and taken to the Safety-Kleen facility in La Crosse, Wisconsin, for recycling.
10.	Oil-Water Mixture	The oil-water mixture is generated from the press machines and consists of hydraulic oil mixed with water.	The oil-water mixture is considered nonhazardous based on product knowledge and testing (reviewed waste profile).	Approximately 2,800 gallons per quarter	The oil-water mixture is collected in a sump by the press machines.	The oil-water mixture is transported by Safety-Kleen to the Safety-Kleen facility in La Crosse, Wisconsin, where the oil is separated from the water and recycled.
11	General Facility Trash	General facility trash is generated from facility maintenance, cleaning, and office trash.	The facility considers the general facility trash nonhazardous based on process knowledge.	Unknown. Not tracked by the facility.	General facility trash is placed in dumpsters.	General trash is picked up by Waste Management and taken to the Allamakee County landfill.

5. Personnel Training Requirements

Personnel training is required by the LQG regulations specified in 40 CFR Part 262.34(a)(4). According to Mr. Loven, ILNorplex designates the following positions as related to hazardous waste management: Health, Safety and Environmental Manager, Receiving, Treater I and II Operators, Treater Lead, and Compounder. I reviewed ILNorplex's Hazardous Waste Training documentation, including an outline of introductory and continuing training, written job descriptions, and training records for 2006. Copies of sample training documentation are included in Attachment 9. I did not identify any deficiencies with respect to the facility's personnel training requirements.

6. Preparedness and Prevention, Contingency Plan, and Inspection Requirements

According to Mr. Loven, ILNorplex has arranged for emergency response with local emergency agencies and has designated a primary emergency coordinator, Mr. Scott Loven, who is on call or on the premises at all times. Alternate emergency coordinators are also designated. I verified with Mr. Loven that the primary and alternate emergency coordinators are included in annual hazardous waste management training. ILNorplex has a RCRA contingency plan for the facility that is reviewed and updated annually (see Attachment 10). Mr. Loven confirmed that weekly inspections are conducted at the less-than-90-day hazardous waste storage areas. The inspections are conducted by either Mr. Loven or a receiving employee. I reviewed the weekly inspection log. No deficiencies were identified with respect to the facility's preparedness and prevention, contingency plan, or inspection requirements.

7. Waste Determination

I reviewed waste profiles for ILNorplex facility wastes going to System Environmental Corporation and Safety-Kleen. I also reviewed manifests and LDR notices for the facility for the current year to date and for the previous three years (see Attachment 11). No deficiencies were noted with respect to manifest and LDR requirements. Mr. Loven stated that ILNorplex maintains a log of hazardous waste shipped each month; the log is maintained by the Receiving Department operators. A sample of this hazardous waste log is included in Attachment 12. No deficiencies were noted with respect to waste determinations.

8. Air Emissions: 40 CFR Part 265 Subparts AA, BB, CC

EPA regulations contained in 40 CFR Part 265, Subparts AA, BB, and CC apply to LQGs. If a LQG manages hazardous waste with an organic concentration greater than 10 parts per million by weight (ppmw), the standards found in Subpart AA apply to hazardous waste air emissions from certain process

vents. A process vent used in distillation, fractionation, solvent extraction, thin-film evaporation, air stripping, or steam stripping is regulated by Subpart AA. ILNorplex is not subject to the Subpart AA regulations because the facility does not have any of the process vents listed above that are in contact with hazardous wastes.

If a LQG has equipment that contains or contacts hazardous waste composed of 10 percent or greater organics by weight, the facility is subject to Subpart BB standards for inspection and monitoring of the equipment. ILNorplex is not subject to the Subpart BB regulations because it does not have equipment that contains or comes in contact with hazardous waste with an organics concentration exceeding 10 percent.

The standards found in Subpart CC apply to LQGs that manage hazardous waste in containers with volatile organic compounds (VOC) concentration that exceeds 500 parts per million by weight (ppmw). According to Mr. Loven, ILNorplex has determined that the spent solvent and resin wastes generated at the facility have VOC concentrations that exceed 500 ppmw at the points of generation. During the inspection at ILNorplex, I therefore inspected the facility for the requirements of Subpart CC. These requirements apply because ILNorplex stores the spent solvent and resin waste in containers (55-gallon steel containers). ILNorplex meets the Subpart CC requirements for containers by using Container Level 1 controls (containers smaller than 122 gallons that are Department of Transportation-approved). I did not find any deficiencies with regard to the facility's compliance with the Subpart CC requirements.

Ann Y. Galbraith, CHMM
Environmental Engineer
Tetra Tech EM Inc.

Date: August 27, 2007

Attachments:

1. Multimedia Screening Checklist (2 pages)
2. RCRA Info Data Verification Handler Information Report (1 page)
3. Data Gathering Worksheets and Checklists (33 pages)
4. Receipt For Documents and Samples (1 page)
5. Confidentiality Notice (1 page)
6. Notice of Preliminary Findings (1 page)
7. Facility Site Plan (1 page)
8. Photographic Documentation (5 pages)
9. Training Documentation (9 pages)
10. RCRA Contingency Plan (31 pages)
11. Hazardous Waste Manifests and LDR Notices (6 pages)
12. Hazardous Waste Log (2 pages)

ATTACHMENT 1

MULTIMEDIA SCREENING CHECKLIST

(Two Pages)

Forward To: EJ ☐ EPCRA / RMP / TSCA ☒ CWA ☐ Wetlands ☐ UIC ☐ PWS ☐ CAA / CFC ☒ RCRA ☐ UST ☒ SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Industrial Laminates/Norplex Inc.
Facility Ownership: Honeywell (corporate)/Private
Street: 665 Lyboard St.
City: Postville State: IA Zip: 52162
Phone (563) 864-4227 Facility Contact: Scott Lovern
Number of Employees: ≥ 180 Work Hours/Shifts 7-12, 12-5, 3 shifts, M-F Facility Subject to OSHA regulations Yes ☒ No ☐

Inspector Ann V. Galbraith
Primary Media: RCRA
Inspector Phone Ext.: 913-485-3544
Date: 5/17/07
SIC/NAICS Code 32613

Main facility activity, major process chemical(s) & description: Manufacture industrial laminates

(**Check all that apply**): painting/coating (water-based ☐, solvent-based ☐), printing ☐, reacting ☐, formulating ☐, distilling ☒, water treatment ☐, refrigeration ☐, manufacturing ☒, parts washers/degreasing (water-based ☐, halogenated-based ☐, non-halogenated-based ☒), combustion (boiler, furnaces, oxidizers) ☒ plating (chrome ☐, other_____).

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☒ (stop) Yes ☐
   If yes, is facility less then 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ ***Forward to EJ***

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☒ No ☐ ***Forward to EPCRA***
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☒ (stop) Yes ☐ ***Forward to EPCRA***
3. Has the facility: ***If any box in question 3 is marked - Forward to EPCRA***
   a. Stored ≥500 lbs of ammonia ☐, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☒, at any time over the last 2 years? ☒
   b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☒
   c. Used ≥10,000 lbs of ammonia ☐, chlorine ☐, halogenated solvents ☐, solvent-based paints ☐, or solvents ☒, or nitrated compound, over the last calendar year? ☐
   d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
4. Does the facility have any oil filled electrical equipment No ☐ (stop) Yes ☒ ***Forward to TSCA and ask*** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☒ number containing PCBs greater than 50 ppm 0 and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☒ Yes ☐ – ***Get Photo***

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☒ (stop) Yes ☐
   If yes, are all wastewater discharges permitted? Yes ☐ No ☐ ***Forward to CWA***
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☐ (stop) Yes ☒
   If yes, are the discharges permitted by: State? ☐, City? ☒ – If yes, Stop here. No ☐ ***Forward to CWA***
   If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ ***Forward to CWA***
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☐ (stop) Yes ☒
   If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☒ No ☐ ***Forward to CWA***
4. Did you see any wastewater discharges not identified by the facility? No ☒ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ (***Get Photo***) ***Forward to CWA***
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☐ (stop) Yes ☐
   If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years?
   No ☐ (stop) Yes ☐ - Identify location and timeframe_____ (***Get Photo***) ***FWD to Wetlands***

ATTACHMENT 2

RCRA INFO DATA VERIFICATION HANDLER INFORMATION REPORT

(One Page)

HANDLER INFORMATION REPORT

March 5, 2007

PROCEDURES for Inspectors/Investigators/etc. performing Site Visits

Present the Facility representative with a copy of their:

- Handler Information Report (attached)
- Copy of the current Notification Form (attached)
- Copy of the current Notification Booklet (attached)

Our instructions to them are printed on their Handler Information Report - and should be self explanatory. If the facility wants to revise their Handler Information Report, they can do so and mail it back to EPA - or have the inspector deliver it.

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Lisa Haugen, ARTD/RESP.

EPA RCRA ID Number: IAD073489288

Name of Company/Site: INDUSTRIAL LAMINATES/NORPLEX INC
Location of Site: 665 LYBRAND ST
POSTVILLE, IA 52162-9702
ALLAMAKEE County

Land Type: Private

NAICS: 32613 - Laminated Plastics Plate, Sheet (except Packaging)

Mailing Address: P O BOX 977
POSTVILLE, IA 52162-0977

Site Contact: SCOTT R LOVEN
Phone Number: (563)864-4227
Address: PO BOX 977
POSTVILLE, IA 52162-0977
Email: SLOVEN@NORPLEX-MICARTA.COM

Current Owner of Site: HONEYWELL
Owner Type: Private

Current Operator of Site: INDUSTRIAL LAMINATES/NORPLEX INC
Operator Type: Private

TYPE(S) OF REGULATED ACTIVITY: Federal Large Quantity Generator, Used Oil Generator

Hazardous Wastes Handled: D001 D002 D007 D008 D009 D018 D035
F003 F005 U002 U122 U154 U159 U220
UOIL

I 05/20/03 1 1st N 02/15/00 N 03/01/06 1

Certified by 05 Biennial on 03/01/06 by
SCOTT LOVEN 03/01/06
HS&E MGR

Attachment 2 Page 1 of 1

Date of Site Visit: 05/17/07

Name of Inspector (Please print): Ann V. Galbraith

(Check one): ☐ EPA R7 ENSV ☒ EPA R7 Contractor ☐ NOWCC/SEE Investigator

Signature of Inspector: Ann V. Galbraith

ATTACHMENT 3

DATA GATHERING WORKSHEETS AND CHECKLISTS

(33 Pages)

Appendix 1-1

DATA GATHERING WORKSHEET AND CHECKLIST INSTRUCTIONS AND KEY

1. Complete all items on the applicable data gathering worksheet and checklist in a neat and legible fashion.

2. All responses will be based on the inspector's knowledge and best judgement and information obtained from facility the representative(s) at the time of the inspection.

3. A (✓) mark should be used to mark the all boxes (☐) and will indicate the choice made or the action completed.

4. The Records Review Worksheet and Checklists and the Visual Review Worksheet and Checklists each have a key below the tables. Use this key when filling out these forms.

a. Items which are shaded gray on the worksheets and checklists are considered high priority items during inspections and should always be completed.

b. On the top of the worksheets and checklists are a group of boxes which represent the generator status of the facility and whether or not the facility is subject to interim status or permit requirements. The appropriate box should be checked.

5. The inspector should pay special attention to the questions contained in this box and make sure that they are able to answer them as relates to inspection documentation.

DOCUMENTATION: ***HOW*** are the facts known? ***WHO*** said what? ***WHEN*** did it happen? ***HOW long did it happen?*** and ***WHAT PROOF WAS OBTAINED?***

6. Each of the forms has a space at the bottom to indicate the Attachment number and page when the form is included in the report. The attachment number and page should be used when referencing information contained on the form in the inspection report.

Appendix 1-2

PRE-INSPECTION ITEMS TO CHECK

General Equipment:

- hardhat
- safety glasses
- camera
- calculator
- GPS unit
- post-its
- coveralls
- film
- pH paper
- rubber boots
- tape measure
- notebook
- compass
- tape recorder
- safety gloves
- safety boots
- ice chest
- batteries
- safety shoes
- back-up camera
- flashlight
- binoculars
- pens/markers
- winter gloves
- ear plugs
- coat
- respirator

Special Equipment?: _____

_____

Paperwork:

- NOV, CBI & Rec. for Doc. forms
- Reference Information
- Data Collection Worksheets
- Notification forms
- Regulations (Federal/State)
- Multi-Media form
- Facility Files

Items Needed:

- Load Camera
- Change Phone Message
- Change Phone Message
- Credentials
- Car Book/Keys/Credit Card
- Sign-out On Board Considerations?
- Daily Planner
- Business Cards
- Special Health or Safety

Notes: _____

_____

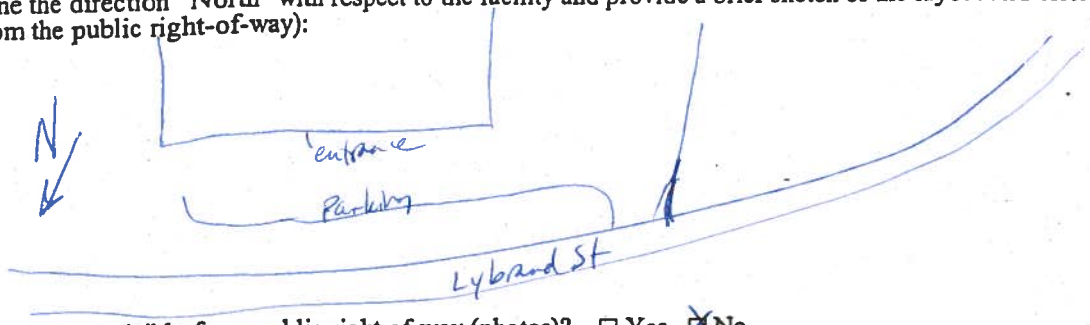
Appendix 1-3

Facility: Industrial Laminates/Norplex Date: 05/17/07 Arrival time: 9Am

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☒ Yes ☐ No

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



3. Obvious concerns visible from public right-of-way (photos)? ☐ Yes ☒ No

- Containers	- Tanks	- Processing Equipment	- Loading Areas
- Unloading Areas	- Security Devices	- Open Drums	- Stressed Vegetation
-Unusual Staining	- Unusual Odors	- Obvious Discharges	- Improper Disposal
- Safety Concerns	- Other Concerns		

Appendix 1-4

SITE ENTRY AND INBRIEFING

1. ☒ Used main entrance ☒ Entered during normal operating hours ☐ Excessive delays (>15 minutes - denial of access?) - ☒ No

2. Facility Representative(s): Scott Lovell Title: HS&E Manager

_____ Title: _____

_____ Title: _____

3. Does representative have intimate knowledge of all waste management practices? ☒ Yes ☐ No

How long in position? 11 years

4. Introduction:
   - ☒ Presented credentials
   - ☒ Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
   - ☒ Verified presence at correct facility (checked address/I.D. #)
   - ☒ Explained authority to conduct inspection (Section 3007 of RCRA)
   - ☒ Identified personal safety considerations: Safety glasses
   - ☒ Explained the purpose, scope, and order of the inspection
   - ☒ Completed Multimedia screening checklist
   - ☒ Explained documentation process - worksheets, checklists, photo's, notes, statements, etc
   - ☒ Provided SBRFA
   - ☐ Obtained GPS reading N/A
   - ☒ Explained facility's right to claim CBI

5. Was full access granted? ☒ Yes ☒ By facility representative or Other(name): _____

☐ No - Access denied Name of person denyingaccess: _____

Time of denial: _____

Reason for denial, or limitations placed on access:

Appenidx 1-5

FACILITY BACKGROUND WORKSHEET

1. Site history:
Date facility began operating: 1974 Number of employees: ~180
Number of shifts/hours worked: 3/8-4 4-12 12-8 Number of days worked per week: M-F
Size (sq. ft., how divided): ~22 acres ; ~130,000 ft² under roof
Property owner and facility operator the same? ☐ YES ☒ NO
Property owned by Honeywell ; company (operator) owned by Industrial Dielectric in IN

2. Major products or services provided: Manufacture industrial laminates

3. Major raw materials used: Phenolic resin, epoxy resin, solvents (various)
paper, glass cloth, cotton cloth

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process	Waste Stream(s)
Laminate Process Line	Spent Solvent and Resin Cleanup Rags Melamine Water
Solvent Distillation Unit	Still Bottoms
Facility Operation/Maintenance	Spent Solvent and Resin (from many solids to dist-II) Oil-Water Mixture Used Oil Spent Lamps Spent Parts Washer Solvent General Facility Trash
Corrective Action	Contaminated Groundwater

5. Complete a Generator Waste Stream Worksheet and/or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☒ YES ☐ NO

7. GENERATOR STATUS: (based on records review)
☐ Non-generator
☐ CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1 kg acute waste or 100 kg of acute spill residue)
☐ SQG (100-1000kg/mo and accumulate <6000 kg)
☒ LQG (>1000kg/mo)

Is facility's status solidly within above category? ☒ YES ☐ NO
(If not carefully verify status and document)

8. TSD STATUS: ☐ Treatment ☐ Storage ☐ Disposal N/A

Note: Types of units, number of units, capacities, processes, etc.

9. Resolved questions from Pre-Inspection Worksheet? ☐ YES ☐ NO ☒ No Questions

10. Resolved compliance officers questions from Pre-Inspection Worksheet? ☐ YES ☐ NO ☒ No Questions

11. Requested site map or diagram to identify all observations? ☒ YES ☐ None available

Appendix 1-6 **GENERATOR WASTE STREAM WORKSHEET**

1. WASTE STREAM: Spent Solvent and Resin

FACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D001, F003, F005

DETERMINATION METHOD: ☒ product knowledge ☒ process knowledge ☒ testing
Documentation: Waste Profile
GENERATING PROCESS: Cleaning process line dip pans and general cleaning

GENERATION RATE: ~300 gallons/month

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☒ visually inspected
Collect in 55-gal containers in process line <90 day hazardous waste storage area. Take full containers to still room for distillation

OFF-SITE MANAGEMENT / DISPOSITION: None

2. WASTE STREAM: Still Bottoms

FACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D001, F003, F005

DETERMINATION METHOD: ☐ product knowledge ☒ process knowledge ☒ testing
Documentation: Waste Profile
GENERATING PROCESS: Distillation of spent solvent

GENERATION RATE: ~375 pounds per month

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☒ visually inspected
Collect in 55-gal containers in still room <90 day haz waste storage area

OFF-SITE MANAGEMENT / DISPOSITION: Transported by Pioneer Tank Lines to Systech Environmental Corporation in Fredonia, KS for fuel blending (cement kiln fuel)

3. WASTE STREAM: Spent Solvent and Resin (high solids)

FACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D001, F003, F005

DETERMINATION METHOD: ☒ product knowledge ☒ process knowledge ☒ testing
Documentation: Waste Profile
GENERATING PROCESS: Cleaning process line dip pans; solids (hardened resin)

GENERATION RATE: ~30,000 lbs/month

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☒ visually inspected
Collect in 55-gal containers at process line <90 day hazardous waste storage area and outside <90 day hazardous waste storage area

OFF-SITE MANAGEMENT / DISPOSITION: Transported by Pioneer Tank Lines to Systech in Fredonia, KS for fuel blending

Appendix 1-6 **GENERATOR WASTE STREAM WORKSHEET**

4 **1. WASTE STREAM:** Cleanup Rags

FACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D001, F003, F005

DETERMINATION METHOD: ☐ product knowledge ☒ process knowledge ☒ testing
Documentation: Waste Profile
GENERATING PROCESS: Cleaning dippans, wiping off dippans, general cleaning

GENERATION RATE: 30-55 gallons/month

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☒ visually inspected
Collect in 55-gallon hazardous waste storage containers in <90 day storage area

OFF-SITE MANAGEMENT / DISPOSITION: Transported by Pioneer Tank Lines to Systech for fuel blending

5 **2. WASTE STREAM:** Melamine Water

FACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D001, F003, F005

DETERMINATION METHOD: ☒ product knowledge ☐ process knowledge ☒ testing
Documentation: Waste Profile
GENERATING PROCESS: Cleanup with water (rinsate) of melamine-based resin

GENERATION RATE: ≈4,500 lbs/month

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☒ visually inspected
Collect in 55-gallon hazardous waste storage containers in <90 day storage areas

OFF-SITE MANAGEMENT / DISPOSITION: Transported by Pioneer Tank Lines to Systech for fuel blending

6 **3. WASTE STREAM:** Contaminated Groundwater

FACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D001, D007, D008, F003, F005

DETERMINATION METHOD: ☐ product knowledge ☒ process knowledge ☒ testing
Documentation: Analytical report
GENERATING PROCESS: Corrective action to remediate ~~gw~~ solvent-contaminated groundwater

GENERATION RATE: ≈ 500 gallons per month

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☒ visually inspected
Collected in 275-gallon plastic totes in outside <90 day storage area

OFF-SITE MANAGEMENT / DISPOSITION: Transported by Veolia ES Industrial Services in a tank truck to Veolia ES Technical Solutions for aggregation prior to disposal by solvent extraction and incineration

Appendix 1-6

GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: ~~Contaminated Groundwater~~ Used Oil

FACILITY DETERMINATION: ☐ Hazardous ☒ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: None

DETERMINATION METHOD: ☒ product knowledge ☐ process knowledge ☒ testing
Documentation: Waste profile analytical report
GENERATING PROCESS: Maintenance of press machines

GENERATION RATE: ≈ 1,500 gallons per year

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected
Collected in 1,500-gal AST in boiler room

OFF-SITE MANAGEMENT / DISPOSITION: Picked up by Safety-Kleen; to Safety-Kleen in La Crosse, WI for recycling.

2. WASTE STREAM: Spent Parts Washer Solvent

FACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: D039

DETERMINATION METHOD: ☒ product knowledge ☐ process knowledge ☒ testing
Documentation: Safety-Kleen profile for recycled solvent
GENERATING PROCESS: Service of parts washer unit

GENERATION RATE: ≈ 25 gallons every 6 weeks

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected
Remains in parts washer unit until serviced by Safety-Kleen

OFF-SITE MANAGEMENT / DISPOSITION: Transported by Safety-Kleen to Safety-Kleen facility in La Crosse, WI for recycling

3. WASTE STREAM: Spent Lamps

FACILITY DETERMINATION: ☒ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: Universal Waste

DETERMINATION METHOD: ☒ product knowledge ☒ process knowledge ☐ testing
Documentation: Package information
GENERATING PROCESS: Replaces spent lamps throughout facility

GENERATION RATE: ≈ 150 lamps per year

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected
Collect in cardboard boxes in boiler room

OFF-SITE MANAGEMENT / DISPOSITION: Picked up by Retrofit Recycling ≈ once a year for recycling

Appendix 1-6 **GENERATOR WASTE STREAM WORKSHEET**

10. **1. WASTE STREAM:** Oil-Water Mixture

FACILITY DETERMINATION: ☐ Hazardous ☒ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: None

DETERMINATION METHOD: ☒ product knowledge ☐ process knowledge ☒ testing
Documentation: ~~None~~ Waste profile
GENERATING PROCESS: Maintenance and cleaning of press machines (hydraulic oil and water)

GENERATION RATE: ≈ 2,800 gallons per quarter

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected
Collected in sump when press machines are serviced

OFF-SITE MANAGEMENT / DISPOSITION: Transported by Safety-Kleen to La Crosse, WI; oil separated from water and recycled.

11. **2. WASTE STREAM:** General Facility Trash

FACILITY DETERMINATION: ☐ Hazardous ☒ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES: None

DETERMINATION METHOD: ☒ product knowledge ☒ process knowledge ☐ testing
Documentation: None
GENERATING PROCESS: Facility maintenance and cleaning; office trash

GENERATION RATE: Unknown. Not tracked by facility.

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected
Placed in dumpsters

OFF-SITE MANAGEMENT / DISPOSITION: Picked up by Waste Management and taken to Allamakee County landfill.

~~3.~~ **WASTE STREAM:**

FACILITY DETERMINATION: ☐ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate
WASTE CODES:

DETERMINATION METHOD: ☐ product knowledge ☐ process knowledge ☐ testing
Documentation:
GENERATING PROCESS:

GENERATION RATE:

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected

OFF-SITE MANAGEMENT / DISPOSITION:

Appendix 1-8

RECORDS REVIEW WORKSHEET AND CHECKLIST

A. MANIFESTS

#	✓/ x	REGULATORY REQUIREMENT	MANIFEST #'s AND COMMENTS
1.	✓	Facility uses manifest system-262.20(a)	
2.	✓	Manifests maintained for 3 years-262.40(a)	
3.	✓	Generator EPA I.D. number-262.20(a)	
4.	✓	Generator name, address, phone number-262.20(a)	
5.	✓	Transporter(s) name & EPA I.D. number-262.20(a)	
6.	✓	Designate facility name, address & EPA I.D. number-262.20(a)	
7.	N/A	Alternate facility designated (optional)-262.20(c)	
8.	✓	Unique five digit document number and number of pages-262.20(a)	
9.	✓	DOT shipping name, hazard class, waste code, & RQ (if required-49 CFR 172)-262.20(a)	
10.	✓	Containers: numbers, type, quantity, unit wt/vol. -262.20(a)	
11.	✓	Proper certification (highway, rail, water or air) including waste minimization-262.20(a)	
12.	✓	Signed and dated-262.23(a)	
13.	N/A	Exception report submitted if necessary-262.42	
14.		Waste reclaimed under contractual agreement (SQG only)-262.20(e)(1)	
15.		Generator maintains copy of contractual agreement (SQG only)-262.20(e)(2)	
16.	✓	LDR notification/certification sent with manifests on 1st shipment -268.7(a)	
17.	✓	LDR notification/certification includes: manifest number, correct EPA waste codes & treatment standards, and waste analysis data-268.7	
18.	✓	LDR notification/certification/ waste analysis data & other documents maintained for 3 years-268.7.(a)(8)	
19.	✓	Biennial Reports submitted per 262.41 (LQG only)	

✓-in compliance X-not in compliance N/A-not applicable

20. Approximate number of manifests generated since last inspection, or over past 3 years 45

21. Approximate number of manifests reviewed: 30

22. Copies of manifests made with regulatory violations? ☐ YES ☐ NO N/A

#	✓/X	ADDITIONAL I.S./PERMIT* REGULATORY REQUIREMENTS	MANIFEST #'s AND COMMENTS
a.	N/A	Manifests signed and dated-265.71(a)(1)	
b.		Manifest discrepancies noted and corrected w/in 15 days-265.71(a)(2)	
c.		Copy immediately given to transporter-265.71(a)(3)	
d.		Copy sent to generator w/in 30 days-265.71(a)(4)	
e.		Manifests retained for 3 years-265.71(a)(5)	
f.		LDR notification/certifications retained for 3 years-268.7 (e)(2)	
g.		Biennial Reports submitted per 265.75	

✓-in compliance X-not in compliance N/A-not applicable *-please note applicable permit requirement

h. Approximate number of manifest received since last inspection _____, or over past 3 years _____

i. Approximate number of manifests reviewed: _____

j. Copies of manifests made with regulatory violations? ☐ YES ☐ NO

B. PREPAREDNESS AND PREVENTION

#	✓/x	REGULATORY REQUIREMENTS	COMMENTS
1.	✓	Arrangements with local emergency agencies made-262.34(d)(4)-265.37 [SQG] or 262.34(a)(4)-265.37 [LQG, I.S.]	
2.	✓	Emergency coordinator on premiss or on call-262.34(d)(5) [SQG] or 262.34(a)(4)-265.55 [LQG, I.S.]	
3.	N/A	Emergency coordinator's name and phone number, fire departments phone number, and the location of fire extinguishers and spill control equipment posted near phone [SQG only]-262.34(d)	

✓-in compliance X-not in compliance N/A-not applicable

C. CONTINGENCY PLAN

(SQG - N/A, LQG's-262.34(d)(4) referencing 265 Subpart D, I.S.-265 only)

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
1.	✓	Has contingency plan -265.51(a)	
2.	✓	Contingency plan maintained on-site-265.53(a) .	
3.	✓	Plan submitted to emergency response agencies-265.53(a)	
4.	✓	Description of actions needed to respond to fires, explosions, or releases of hazardous waste-265.52(a)	
5.	✓	Description of arrangements with local emergency agencies, as appropriate-265.52(c)	
6.	✓	List names, addresses & phone numbers (both home and office) of emergency coordinators & designate primary EC-265.52(c)	
7.	✓	List & describe emergency equipment, its location and its capabilities, as required-265.52(e)	
8.	✓	Include complete evacuation plan (signal, alternate route), if required-265.52(f)	
9.	✓	Emergency coordinator must be thoroughly familiar will all aspects of facility-265.55	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirements

D. PERSONNEL TRAINING

(SQG - 262.34(d)(5)(iii), N/A, LQG's-262.34(a)(4) referencing 265.16, I.S.-265.16 only)

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
1.	✓	Program director trained in hazardous waste management procedures (LQG only)-265.16(a)(2)	
2.	✓	Employees do not work unsupervised without completing training & are trained within 6 mo. of initial hiring (LQG only)-265.16(b)	
3.	✓	Employees are trained annually (LQG only)-265.16(c)	
4.	✓	Job title & name of person filling position specified (LQG only)-265.16(d)(1)	
5.	✓	Written job description including: skills, education or qualification, and duties (LQG only)-262.16(d)(2)	
6.	✓	Written description of type and amount of introductory & continuing training provided (LQG only)- 265.16(d)(3)	
7.	✓	Training covers: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required (LQG only)-265.16(a)(3)	
8.	✓	Documentation confirming training has been completed (LQG only)-265.16(d)(4)	
9.	✓	Records maintained on-site for current employees & for 3 years for former employees- 265.16(d) & (e) respectively	
10.	✓	All employees are familiar with waste handling and emergency procedures relevant to their responsibilities (SQG only)-262.34(d)(5)(iii)	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirements

11. Notes/Observations:_____

E. WASTE ANALYSIS/WASTE DETERMINATION AND LAND DISPOSAL RESTRICTIONS

1. Location of waste analysis/waste determination records: Health, Safety & Environmental Office

2. Person responsible for waste analysis/waste determination: Scott Loven

#	✓ /x	REGULATORY REQUIREMENTS	COMMENTS
3.	✓	Determines if waste is a hazardous waste-262.11	
4.	✓	Determines if waste is restricted from land disposal - 262.11(d)-268.7(a)	
5.	N/A ✓	Determines waste does not meet applicable treatment standards (ATS) - 268.7(a)(2)	
a.	N/A	One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file - 268.7(a)(2)	
b.	N/A	SQG disposes of waste under a contractual or tolling agreement - 268.7(a)((10). (LDR Notice available for the initial shipment and Copy of LDR Notice kept for 3 years after termination of agreement).	
6.		Waste covered by a National Capacity Variance(s)- 268 Subpart C, Extension, or Petition - 268.5 & 6. (Describe the variance, extension, or petition that applies):	
a.		Provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs - 268.7(a)(4).	
7.	✓	Ships waste(s) covered by the LDRs off-site for treatment or disposal - 268.7(a)(1) If no, go to 8.	
a.	✓	Provides a notice with initial shipment, or new notification, if changes occur - 268.7(a)(1)	
b.	✓	Notice includes: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable.	
8.	N/A	Determined waste to be excluded from the definition of hazardous or solid waste, or exempt from Subtitle C regulations under 261.2 thru 261.6 subsequent to the point of generation - 268.7(a)(7).	
a.		Retains a one-time notice describing the generation, subsequent exclusion or exemption, and the disposition of the waste, in the facility's on-site files - 268.7(a)(7). (If soil contaminated with waste, a special certification statement is included with the notice) - 268.7(a)(2)(i)	
9.		Determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment - 268.7(a)(3).	
a.		One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file - 268.7(a)(3)(i)	
10.		Additional special rules regarding waste that exhibits a characteristic - 268.9.	

a.	N/A	If not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i) - 268.9(a)
b.		If land disposed, waste meets the treatment standards specified in 278 Subpart C - 268.9(c)
c.		First claims that their characteristic waste is no longer hazardous - sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes is process, operation or receiving facility - 268.9 (d)
11.	✓	Impermissible dilution of waste to meet LDR standards is not occurring-268.11(d)-268.3(a) & (b)
12.	N/A	If hazardous waste prohibited from land disposal is either: a contaminated soil, or is a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge - See additional LDR checklists in Appendix 2-1.
13.		References to Waste Specific Prohibitions under Subpart C: - Wood Preserving Wastes - 268.30 - Dioxin-containing Wastes - 268.31 - TC Metal Wastes - 268.34 - Petroleum Refining Wastes - 268.35 - Ignitable and Corrosive Characteristic Wastes Whose Treatment Standards Were Vacated - 268.37 - Newly Identified Organic Toxicity Characteristic Wastes and Newly Listed Coke By-Product and Chlorotoluene Production Wastes - 268.38 - Spent Aluminum Pot liners; Reactive; and Carbamate Wastes - 268.39
14.		Prohibition on Storage of Restricted Waste - 268.50
15.	✓	Reminder - Treatment Standards listed in 268.41 through 268.49

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit standards

16. Notes/Observations:

J. USED OIL - RCRA INSPECTION CHECKLIST

1. What Used Oil activities does the facility engage in? Used oil generator

a. Type of used oil generated? Hydraulic oil
b. Amount of used oil generated? 1,5200 gallons/year ; also generate ~~used~~ oil-water mixture @ 2,500 gallons/quarter

40 CFR 279.12 Prohibition Questions

1. Is used oil being managed only in a surface impoundment or waste pile subject to regulation under 40 CFR Parts 264 or 265?
☐ Yes ☒ No ☐ Not Applicable (NA)

2. Is used oil being used as a dust suppressant? ☐ Yes ☒ No

3. Is off-specification oil fuel burned for energy recovery in only industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part279.12 (C)(1-3)? ☐ Yes ☒ No

Subpart C - Standards for Used Oil Generators

(Check here ☐ if this section is NA)

✎ *Instructions:* *Fill out this section if the facility generates used oil or if facility activities first caused the used oil to become subject to regulation (see definition and applicability of used oil generator in 40 CFR 279.20). Used oil generators are subject to all applicable Spill Prevention, Control and Countermeasures (SPCC) requirements (40 CFR Part 112) and underground storage tank standards (40 CFR Part 280) in addition to the requirements of Subpart C.*

Regulation and Standard		Violations
279.21 Hazardous Waste Mixing		
1. Is the generator mixing hazardous waste with used oil?	☐ Yes ☒ No ☐ NA	
If yes, is the generator of a used oil containing greater than 1,000 parts per million (ppm) total halogens managing the used oil as a hazardous waste unless the used oil presumption is rebutted?	☐ Yes ☐ No ☑ NA	
2. Are analytical data available?	☐ Yes ☐ No ☑ NA	
279.22 Used Oil Storage		
1. Does the generator only store used oil in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265?	☑ Yes ☐ No ☐ NA	
2. Are containers and aboveground tanks used by a generator to store used oil in good condition, with no visible leaks?	☑ Yes ☐ No ☐ NA	
3. Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"?	☑ Yes ☐ No ☐ NA	
4. Upon detection of a release of used oil, has the generator		
a. Stopped the release?	☐ Yes ☐ No ☑ NA	
b. Contained the release?	☐ Yes ☐ No ☑ NA	
c. Cleaned up and managed the used oil and other materials?	☐ Yes ☐ No ☑ NA	
d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	☐ Yes ☐ No ☑ NA	
279.23 On-Site Burning in Space Heaters		
1. Is the generator burning used oil in used oil fired space heaters only when		
a. The heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourself generators?	☐ Yes ☐ No ☑ NA	
b. The heater is designed to have a maximum capacity of not more than 0.5 million British Thermal Units per hour?	☐ Yes ☐ No ☑ NA	
c. The combustion gases from the heater are vented to ambient air?	☐ Yes ☐ No ☑ NA	

Regulation and Standard		Violations
279.24 **Off-Site Shipment**		
1. Has the generator ensured that the used oil is hauled only by a transporter that has obtained an U.S. Environmental Protection Agency (EPA) identification (ID) number?	☑ Yes ☐ No ☐ NA	
2. Does the generator have a tolling arrangement with a transporter without an EPA ID number?	☐ Yes ☐ No ☑ NA	
If yes, answer the three following questions. If no, move to question 6.		
3. Is the used oil reclaimed and returned by the processor or re-refiner to the generator for use as a lubricant, cutting oil, or coolant?	☐ Yes ☐ No ☑ NA	
4. Does the tolling contract indicate the type of used oil and the frequency of shipment?	☐ Yes ☐ No ☑ NA	
5. Is the vehicle used to transport the used oil to the processing or re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor or re-refiner?	☐ Yes ☐ No ☑ NA	
6. Does the generator transport used oil generated at the generator's site or used oil collected from household do-it-yourselfers to a used oil collection center or to aggregation points owned by the generator?	☐ Yes ☑ No ☐ NA	
Regulation and Standard		**Violations**
7. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?	☐ Yes ☑ No ☐ NA	
8. Does the generator transport no more than 55 gallons of used oil at any time?	☐ Yes ☐ No ☑ NA	
9. Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil?	☐ Yes ☐ No ☑ NA	

For further Used Oil questions refer to Appendix 2-4:

Subpart D - Standards for Used Oil Collection Centers and Aggregation Points
Subpart E - Standards for Used Oil Transporters and Transfer Centers
Subpart F - Standards for Used Oil Processors and Re-Refiners
Subpart G - Standards for Used Oil Burners Who Burn Off-Specification Used Oil for Energy Recovery
Subpart H - Standards for Used Oil Fuel Marketers

K. Universal Waste (UW)

1. Universal Waste Generated Waste:	Fluorescent & HID Lamps	Batteries	Thermostats	Pesticides
Qty. Generate/year:	≈150/year	N/A	N/A	N/A
Qty. Presently in storage:	≈100			
Accumulation Time:	10 months			
Present Disposal Method:	Recycling			

2. Person(s) responsible for universal waste management: _____

3. Does the universal waste handler accumulate (collectively) 5,000 kilograms or more at any time (40 CFR 273.6)? If YES, a large quantity handler (LQH) go on and also refer to checklist in Appendix 2-2. If NO, a small quantity handler (SQH), go on.

Assessing Requirements Common to *Universal Waste SQH & LQH* (40 CFR 273 Subpart B & C, respectively):

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
1.	✓	Disposal of UW is not occurring 273.11/273.31	
2.	✓	Diluting or treating universal waste is not occurring, except for responding to releases per 273.17 or by managing specific wastes per 273.13 (waste management)-273.11(b)/273.31(b)	
3.	N/A	Has the LQH notified of UW management - 272.32 & 32(b) - (Not required for SQH).	
4.	✓	Has the UW been shipped to another UW handler, a designated facility, or a foreign destination - 273.18(a)/273.38(a). If not, see Appendix 2-2 for off-site shipments.	
a.	N/A	Does LQH have documentation tracking shipments - 273.39 - (Not required for SQH - 273.19).	
5.	X	UW package, container, tank, vessel or transport vehicle is marked or labeled - 273.14/273.34 - as follows:	
a.	N/A	"Universal Waste Battery(ies)", or "Waste Battery(ies)", or "Used Battery(ies)" - 273.14(a)/273.34(a)	
b.		For recalled universal waste pesticides; "Universal Waste - Pesticide(s)" or "Waste - Pesticide(s)", and the label that was on or accompanied the product as sold or distributed, or if the label is not available or not feasible to use, the appropriate Department of Transportation label as identified in 49 CFR 172 - 273.14(b)(2)/273.34(b)(2)	
c.		For unused pesticide products as described in 40 CFR 273.3(a)(2): (1) the label that was on the product when purchased, if still legible; (2) if using that label is not feasible, the appropriate label required under DOT regulation 49 CFR part 172; (3) if using either of the previously described labels is not feasible, another label prescribed or designated by the waste pesticide collection program administered or recognized by a state; and (4) the words "Universal Waste - Pesticide(s)" or "Waste - Pesticide(s)" - 273.14(c)/273.34(c)	
d.		"Universal Waste - Mercury Thermostats," or "Waste Mercury Thermostats," or "Used Mercury Thermostats."- 273.14(d)/273.34(d)	
e.	X	"Universal Waste–Lamp(s)" or "Waste Lamp(s), or "Used Lamp(s)"- 273.14(e)/273.34(e)	Some containers of UW not labeled

6.	✓	Accumulation Time Limits- 273.15/273.35 A UW handler may accumulate universal waste no longer than a year from the date of generation or receipt from another handler, unless the requirements of paragraph 273.15(b) are met, as follows:	
a.	N/A	Storage over one year is solely for the purpose of accumulation of such quantities as necessary to facilitate proper recovery, treatment, or disposal and the handler provides proof of this - 273.15(b)/273.35(b) For further requirements of UW retention time documentation, see Appendix 2-2.	
7.	✓	Employee Training- 273.16/273.36 The UW handler must inform all employees who handle or have responsibility for managing universal waste of the proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility	
8.	N/A	Response to Releases- 273.17/273.37 - Did you observe any releases or did any releases occur? - If yes, see Appendix 2-2.	
9.	N/A	Handlers of universal waste that self-transport universal waste off-site, become a universal waste transporter for those self-transportation activities and must comply with the transporter requirements of subpart D of this part while transporting the universal waste- 273.18(b)/273.38(b) - and see Appendix 2-2.	

L. RCRA AIR EMISSIONS - SUBPARTS AA, BB and CC

1. Is this facility a LQG ✓ Interim Status TSD___ or Permitted TSD___ If NOT, do not continue with the RCRA Air Emissions checklists.
2. Location of records: Health, Safety & Environmental Office
3. Person responsible for records: Scott Lover

Assessing RCRA Air Emmission Requirements (Subparts AA, BB and CC) commonly applicalbe:

#	✓/ x	REGULATORY REQUIREMENT	MANIFEST #'s AND COMMENTS
1.	N/A	Subpart AA - 264/5.1030 Does the facility have any hazardous waste management unit using the following processes: distillation, fractionation, thin-film evaporation, solvent extraction, air stripping and steam stripping? If NO, then proceed to the Subpart BB checklist. If YES, refer to specific Subpart AA questions in Appendix 2-3.	~~Solvent distillation Heating unit~~ Not a process unit
2.		SUBPART BB regulated equipment - 264/5.1050 Does the facility have any valves, flanges, or pumps that contain or contact hazardous wastes with > than 10 % organics?	
a.		Does the facility have any compressors, pressure relief devices, sampling connection systems, flanged pipe open-ended valve or line that contain or contact hazardous wastes with > than 10 % organics?	
b.		Is the facility claiming the < 300 hours exemption?	
3.		If any of the answers to questions to 2 (a), (b) or (c) above is Yes, does the facility have a list of each piece of equipment that is subject to Subpart BB. (facility should have a list in their operating record, ask for copy) - 264/5.1064(g).	
a.		If the answer to questions 2(a) or 2(b) is No, does the facility have information or documentation to support its determination (obtain a copy of this documentation for EPA).	
4.		Has this equipment been marked as required by the Subpart BB Regulations? - 264/5.1050(g)	
5.		Has the facility implemented a LDAR program? - 264/5. 1064	
6.		See Appendix 2-3 for more specific Subpart BB questions.	
7.	✓	SUBPART CC - 264/5.1080 Are there any units at the facility subject to the CC Rule?	
a.	N/A	If the answer to 7(a) is No, what is the reason? Refer to 40 CFR 265.1080(b) (264.1080(b) exceptions or 265.1083(c) (264.1082(c)) exemptions, or the general exclusions in 265.1(g) (264.1(g)).	
b.	✓	If the answer is Yes, refer to Appendix 2-3 for more specific Subpart CC questions.	

Appendix 1-9 VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

1. Type of storage area: ☑ < 90 day ☐ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit

2. I.S /Permitted capacity: N/A

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	— 1 55-gal container of spent solvent & resin open while operators actively adding waste
4.	✓	Containers marked as "Hazardous Waste"-262.34(a)(3)	
5.	✓	Containers in good condition-262.34-265.171	
6.	✓	Containers are compatible with waste-262.34-265.172	
7.	✓	Containers kept closed-262.34-265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34-265.173(b)	
9.	N/A	Containers storing incompatible separated or protected from each other-262.34-265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34-265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	✓	Storage area inspected weekly-265.174	
		ADDITIONAL I.S. REQUIREMENTS*	
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.	✓	Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	✓	Placards available for use by transporters when applicable-262.33	

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirement

27. Container inventory: ☒ Actual count ☐ Approximate count

Waste Type	Container Size		Total	
Cleanup Rags	1 x 55 gal.	___ x 30 gal.	25	gal
Spent Solvent & Rags in (melamine scrap)	1 x 55 gal.	___ x 30 gal.	10	gal
	___ x 55 gal.	___ x 30 gal.		
	___ x 55 gal.	___ x 30 gal.		
	___ x 55 gal.	___ x 30 gal.		
	___ x 55 gal.	___ x 30 gal.		
	___ x 55 gal.	___ x 30 gal.		

Total Quantity (pounds, gallons, etc.): 35 gal

28. How were container volumes verified? Visually

29. Photos taken to verify observations: ☐ YES ☒ NO Numbers: _____

30. Container management area location noted on map or diagram: ☒ YES ☐ NO

31. Notes Observations: Process Line <90 day hazardous Waste Storage area

Appendix 1-9 VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

1. Type of storage area: ☑ < 90 day ☐ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit

2. I.S /Permitted capacity: N/A

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste"-262.34(a)(3)	
5.	✓	Containers in good condition-262.34-265.171	
6.	✓	Containers are compatible with waste-262.34-265.172	
7.	✓	Containers kept closed-262.34-265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34-265.173(b)	
9.	N/A	Containers storing incompatible separated or protected from each other-262.34-265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34-265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	✓	Storage area inspected weekly-265.174	
		ADDITIONAL I.S. REQUIREMENTS*	
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.	✓	Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	✓	Placards available for use by transporters when applicable-262.33	

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirement

27. Container inventory: ☒ Actual count ☐ Approximate count

Waste Type	Container Size	Total
Spent Solvent Resin (to distill)	8 x 55 gal. ___ x 30 gal.	440 gal
Spent Solvent Resin (to dispose/ phenolic scrap)	~~4~~ x 55 gal. ___ x 30 gal.	~~220~~ 165 gal
Still Bottoms	1 x 55 gal. ___ x 30 gal.	55 gal
Cleanup Rags	2 x 55 gal. ___ x 30 gal.	69 gal
	___ x 55 gal. ___ x 30 gal.	
	___ x 55 gal. ___ x 30 gal.	
	___ x 55 gal. ___ x 30 gal.	

Total Quantity (pounds, gallons, etc.): ~~824~~ 784 gal

28. How were container volumes verified? visually and tapping containers

29. Photos taken to verify observations: ☒ YES ☐ NO Numbers: 1 & 2

30. Container management area location noted on map or diagram: ☒ YES ☐ NO

31. Notes Observations: Still Room <90 day hazardous waste storage area

Appendix 1-9 VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

1. Type of storage area: ☒ < 90 day ☐ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit

2. I.S /Permitted capacity: N/A

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste" 262.34(a)(3)	
5.	✓	Containers in good condition-262.34-265.171	
6.	✓	Containers are compatible with waste-262.34-265.172	
7.	✓	Containers kept closed-262.34-265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34-265.173(b)	
9.	N/A	Containers storing incompatible separated or protected from each other-262.34-265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34-265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	✓	Storage area inspected weekly-265.174	
		ADDITIONAL I.S. REQUIREMENTS*	
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.	✓	Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	✓	Placards available for use by transporters when applicable-262.33	

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirement

27. Container inventory: ☐ Actual count ☒ Approximate count

Waste Type	Container Size	Total
Spent Solvent and Resin	64 x 55 gal. ___ x 30 gal.	3,520 gal
Cleanup Rags	7 x 55 gal. ___ x 30 gal.	385 gal
Still Bottoms	1 x 55 gal. ___ x 30 gal.	55 gal
	___ x 55 gal. ___ x 30 gal.	
	___ x 55 gal. ___ x 30 gal.	
	___ x 55 gal. ___ x 30 gal.	
	___ x 55 gal. ___ x 30 gal.	

Total Quantity (pounds, gallons, etc.): 3,575 gal

28. How were container volumes verified? Scott Lovell, only full containers moved to this area

29. Photos taken to verify observations: ☒ YES ☐ NO Numbers: 3

30. Container management area location noted on map or diagram: ☒ YES ☐ NO

31. Notes Observations: Outside <90 day storage area
Also 3, 275-gallon totes for contaminated ground water; 2 full, 1 2/3 full

Appendix 1-9 VISUAL REVIEW WORKSHEET AND CHECKLIST

A. CONTAINER STORAGE AREA

(Complete one form per storage area)

1. Type of storage area: ☒ < 90 day ☐ < 180 day ☐ < 270 day ☐ I.S. ☐ Permit

2. I.S /Permitted capacity: N/A

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Date of accumulation marked and visible-262.34(a)(2)	
4.	✓	Containers marked as "Hazardous Waste" -262.34(a)(3)	
5.	✓	Containers in good condition-262.34-265.171	
6.	✓	Containers are compatible with waste-262.34-265.172	
7.	✓	Containers kept closed-262.34-265.173(a)	
8.	✓	Containers not opened, handled, & stored in a manner to cause them to leak-262.34-265.173(b)	
9.	N/A	Containers storing incompatible separated or protected from each other-262.34-265.177	
10.	✓	Containers of ignitable/reactive waste stored >50 feet from property line [LQG's, I.S. & Permit, only]-262.34-265.176	
11.	✓	Adequate aisle space for type of container management and emergency equipment used-265.35	
12.	✓	Containers stored for less than 90/180/270 days, as applicable-262.34	
13.	✓	Storage area inspected weekly-265.174	
		ADDITIONAL I.S. REQUIREMENTS*	
14.	N/A	Security: controlled entry, 24-hr. surveillance, or barrier-265.14(b)	
15.		"Danger Unauthorized Personnel Keep Out," signs posted-265.14(c)	
16.		"No Smoking" signs conspicuously posted-265.17(a)	
17.		Containers/Tanks clearly marked identifying their contents & with storage start date-268.50(a)(2)	
18.		LDR wastes not stored over 1 yr. without adequate justification-268.50(c)	
19.		Daily inspections loading.unloading areas (when in use)-265.15(a)(4)	
		PRE-TRANSPORT REQUIREMENTS*	
20.	N/A	Waste packaged, labeled, marked, per DOT-262.30, 262.31, 262.32, respectively	
21.	✓	Placards available for use by transporters when applicable-262.33	

#	✓/x	REGULATORY REQUIREMENTS*	COMMENTS
22.	✓	Device available capable of summoning emergency assistance-265.34	
23.	✓	Adequate supply and proper spill control, decontamination and safety equipment (fire blankets, respirators, absorbent, etc.)-265.32	
24.	✓	Adequate water supply for fire control equipment-265.32(d)	
25.	✓	Communication and emergency equipment tested and maintained-265.33	
26.	✓	Facility operated and maintained to minimize possibility of emergency-265.31	

✓-in compliance X-not in compliance N/A-not applicable * - please note applicable permit requirement

27. Container inventory: ☒ Actual count ☐ Approximate count

Waste Type	Container Size		Total	
Spent Solvent & Resin (anhydride waste scrap)	1 x 55 gal.	x 30 gal.	25	gal
Spent Solvent & Resin (distillation)	1 x 55 gal.	x 30 gal.	20	gal
	x 55 gal.	x 30 gal.		
	x 55 gal.	x 30 gal.		
	x 55 gal.	x 30 gal.		
	x 55 gal.	x 30 gal.		
	x 55 gal.	x 30 gal.		

Total Quantity (pounds, gallons, etc.): 45 gal

28. How were container volumes verified? tapping containers

29. Photos taken to verify observations: ☐ YES ☒ NO Numbers:

30. Container management area location noted on map or diagram: ☒ YES ☐ NO

31. Notes Observations: Fourth <90 day hazardous waste storage area

Appendix 1-10

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☒ Yes ☐ No
   - Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurred
   - Illegal units - unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
   - Illegal disposal - how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity

☒ Identified/verified violations from previous inspection were corrected (if applicable) - not all corrected
☒ Addressed all unresolved inspection related issues
☒ Summarized findings and observations for the facility representatives

NOPE NOV issued? ☒ Yes ☐ No ☒ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

☒ Explained the importance of a timely (14 day) and adequate response -
☒ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
☒ Explained that compliance officer will make the final compliance decisions and that all compliance questions should be directed toward them
☒ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
☒ Provided facility with CBI form
☒ Prepared Document Receipt form

3. Specific information requested from facility? ☐ Yes ☒ No

4. Facility appears to have awareness of RCRA regulations ☒ Yes ☐ No

5. Facility has its own environmental staff? ☒ Yes ☐ No
6. Facility has copy of applicable regulations? ☒ Yes ☐ No

7. Attitude and demeanor of facility representative(s): ☒ OK ☐ Not OK _____

8. Notes/Observations: Facility awareness of RCRA ok, but not clear on all requirements. Previous violations for universal waste lamp storage requirements (closed labeled) were not corrected and were noted again during this CEI. The facility took steps to correct these issues at the time of the CEI.

Appendix 2-2 **Universal Waste** (Additional Checklists)

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
1.	N/A	Notification (**Not Required for small quantity handlers, go to 3**)- 273.32 Large quantity handler must have sent written notification of universal waste management to the Regional Administrator, and received an EPA Identification Number, before meeting or exceeding the 5,000 kilogram storage limit, unless the following conditions are met: (1) large quantity handler has already notified of hazardous waste management activities and received and EPA Identification Number, (2) large quantity handler of universal waste who manages recalled universal waste pesticides as described in 40 CFR 273.3(a)(1) and who has sent notification to EPA as required by 40 CFR 165.	
a.		This notification must include - 273.32 (b): (1)universal waste handler's name and mailing address; (2) name and business telephone number of the person at the universal waste handler's site who should be contacted regarding universal waste management activities; (3) the address or physical location of the universal waste management activities; (4) a list of all types of universal waste managed by the handler; (5) a statement indicating that the handler is accumulating more than 5000 kg of universal waste at one time and the types of universal waste the handler is accumulating above the quantity.	
2.	N/A	Universal waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonable foreseeable conditions is contained. The container is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage-273.13(a)(1)/273.33(a)(1) **If not generated, go to 5.**	
3.		Waste Management of Universal Batteries as follows, provided the casing of each individual battery cell is not breached or remains intact and closed (except to remove electrolyte)-273.13(a)(2)/273.33(a)(2)	
a.		Sorting batteries by type-273.13(a)(2)(i)/273.33(a)(2)(i)	
b.		Mixing battery types in one container-273.13(a)(2)(ii)/273.33(a)(2)(ii)	
c.		Discharging batteries so as to remove the electric charge-273.13(a)(2)(iii)/273.33(a)(2)(iii)	
d:		Regenerating used batteries-273.13(a)(2)(iv)/273.33(a)(2)(iv)	
e.		Disassembling batteries or battery packs into individual batteries or cells- 273.13(a)(2)(v)/273.33(a)(2)(v)	
f.		Removing batteries from consumer products-273.13(a)(2)(vi)/273.33(a)(2)(vi)	

g.	N/A	Removing electrolyte from batteries- 273.13(a)(2)(vii)/273.33(a)(2)(vii)	
4.		Handler determines whether any waste(s) generated as a result of the activities listed in 3. above, exhibit a characteristic hazardous waste- 273.13(a)(3)/273.33(a)(3) (If waste is regulated as hazardous waste, complete the hazardous waste generator inspection checklist.)	
a.		If yes, electrolyte and/or other solid waste(s) identified as a characteristic hazardous waste, 40 CFR 260 - 272 requirements are met-273.13(a)(3)(i)/273.33(a)(3)(i)	
b.		If no, the handler manages the waste(s) in an environmentally sound manner that is in compliance with applicable state and federal regulation- 273.13(a)(3)(ii)/273.33(a)(3)(ii)	
5.		Universal Waste Pesticides managed as follows to prevent releases -273.13(b)/273.33(b) **If not generated, go to 6.**	
a.		In a container that remains closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage, under reasonably foreseeable conditions- 273.13(b)(1)/273.33(b)(1)	
b.		In a container that does not meet the conditions listed in 273.13(b)(1) [6.a. above], provided that the unacceptable container is overpacked in a container that does meet those requirements - 273.13(b)(2)/273.33(b)(2)	
c.		In a tank that meets the requirements of 40 CFR part 265 subpart J, except for 40 CFR 265.197(c), 265.200, and 265.201- 273.13(b)(3)/273.33(b)(3)	
d.		In a transport vehicle or vessel that is closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage, under reasonably foreseeable conditions - 273.13(4)/273.33(4)	
6.		Universal Waste Thermostats managed in a way that prevents releases of any universal waste or component of universal waste-273.13(c)/273.33(c) **If not generated, go to 7.**	
a.		Universal waste thermostat that shows evidence of leakage, spillage, or damage that could cause leakage under reasonable foreseeable conditions is contained. The container is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage- 273.13(c)(1)/273.33(c)(1)	

b.	N/A	If mercury containing ampules are removed, the handler: (i)removes the ampules in a manner designed to prevent breakage, (ii) removes ampules only over or in a containment device, (iii) ensures that a mercury clean-up system is readily available to immediately transfer any spilled/leaked mercury from the containment device to an appropriate container per 40 CFR 262.34, (iv) immediately transfers any spilled/leaked mercury to an appropriate container per 40 CFR 262.34, (v) ensures area where ampules are removed is well ventilated and monitored to ensure compliance with OSHA exposure levels for mercury, (vi) ensure employees removing ampules are thoroughly familiar with proper waste mercury handling and emergency procedures, (vii) stores removed ampules in closed, non-leaking containers that are in good condition, (viii) stored in containers with packing materials adequate to prevent breakage during storage, handling, and transportation -273.13(c)(2)/273.33(c)(2) **If not generated, go to 7.**	
c.		Determines if the following exhibit a characteristic of hazardous waste: (A) mercury of clean-up residues resulting from spills or leaks; and/or (B) other solid waste generated as a result of removal of mercury containing ampules - 273.13(c)(3)(i)/273.33(c)(3)(i)	
d.		If the mercury, residues, and/or other solid waste do exhibit a characteristic of hazardous waste, it must managed per applicable hazardous waste requirements and the handler is the generator- 273.13(c)(3)(ii)/273.33(c)(3)(ii)	
e.		If the mercury, residues, and/or other solid waste do **NOT** exhibit a characteristic of hazardous waste, the handler may manage the waste in compliance with federal, state, or local solid waste regulations - 273.13(c)(3)(iii)/273.33(c)(3)(iii)	
7.	X	Lamps are managed in a way that prevents releases of any universal waste or component of universal waste to the environment-273.13(d)/273.33(d)	
a.	X	Lamps are kept in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamp. The containers and packages are closed, and lack evidence of leakage, spillage, or damage that could cause leakage- 273.13(d)(1)/273.33(d)(1)	4 containers of UW lamps were not closed
b.	N/A	Universal waste lamps that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment are immediately cleaned up and placed in a container. The container is closed, structurally sound, compatible, and lacks evidence of leakage, spillage, or damage that could cause leakage or release of mercury or other hazardous constituents to the environment - 273.13(d)(2)/273.33(d)(2)	

SUBPART CC: RCRA SUBPART CC CHECKLIST FOR AIR EMISSIONS AT LQGS AND TSDS

OVERVIEW: The Subpart CC regulations apply to Large Quantity Generators and Treatment, Storage and/Disposal Facilities that manage Hazardous Waste of Volatile Organic Concentration of 500ppmw or more on an average annual basis in Tanks and Containers. For Tank Storage, there are two levels that a facility may use to manage their waste. Tank Level 1 requires a fixed roof tank which uses a maximum organic vapor pressure to comply with Subpart CC. Tank Level 2 designs can be one of five options. These are: (1) an Internal Floating Roof (2) an External Floating Roof (3) a tank with a Fixed Roof vented through a closed vent system to a control device (4) a Pressure Tank (5) a tank located inside an enclosure that is vented through a closed vent system to an enclosed combustion device.
Most of the facilities will comply with Tank Level 1 which is the easiest to follow. The other option that will be seen a lot would be Tank level 2 Option 3. The other options will be limited to a small number of facilities and should be referred to EPA for inspection. As a result, the emphasis of this checklist has been these two options.
For Container Storage, most of the facilities will store their waste in DOT approved containers. RCRA regulations already cover such storage and as a result, most facilities will be in compliance with the container storage regulations of the Subpart CC regulations.
The checklist does not deal with Surface Impoundments because there are only a few active ones remaining in the Region. These should be referred to EPA for inspection.

#	✓/ x	REGULATORY REQUIREMENTS*	COMMENTS
1.	✓	Is this facility a TSD or a Large Quantity Generator (LQG)? ***If NOT, STOP, Air Emissions-Subpart CC regulations do not apply.***	
2.	✓	Are there any units at the facility subject to the CC Rule?	
a.	N/A	If the answer is no, what is the reason? Ref. 40 CFR 264/5.1080(b) exceptions or 265.1083(c) 264.1082(c) exemptions, or the general exclusions in 264/5.1(g), as applicable. **40 CFR 1080(b)exemptions** (1) Unit did not receive HW after 12/6/96 ____ (2) Using containers of less than 26 gallons capacity ____ (3) Unit undergoing closure ____ (4) Units used in an on-site RCRA or CERCLA clean-up ____ (5) Mixed Radioactive and hazardous waste____ (6) Units with CAA, NESHAPS or NSPS controls ____ (7) Tanks with process vents (Subject to Subpart AA) ____ **40 CFR 265.1083(c) exemptions:** (8) Waste stream less than 500 ppmw average VOC ____ If so, was waste determination done per 265.1084? ____YES ___NO (9) All waste placed in unit meets 268.40 (LDR) limits____ (10) Tank is used for bulk feed to incinerator and requirements of 265.1083(5)(i)-(iii) are met ____ **40 CFR 265.1 general exclusions/exemptions:** (11) Hazardous waste recycling unit exemption ____ (12) Satellite accumulation area ____ (13) Totally enclosed treatment facility exemption ____ (14) Elementary neutralization unit ____ (15) Waste water treatment in tanks exemption____ (16) Emergency or spill management exemption ____ (17) Biological treatment with 95 % efficiency ____ Except If exemption is based on (8) above, then STOP, subpart CC does not apply.	

3.	✓	Is the average volatile organic concentration of each waste management unit more than 500 ppmw determined on an average annual basis at point of waste origination? **NOTE : If facility claims that its waste is below 500ppm, then the waste determination documentation should be in the operating record. Inspector should review this documentation and obtain a copy.**	
a.	✓	Are there units subject to Subpart CC?. If YES, does the facility have a list each unit and the concentration in its operating record ? If NO, indicate if the determination for each unit is in the facility operating record? - 264/5.1090	Each unit is a 55-gl drum
4.	N/A	**FOR EACH UNIT, FOR WHICH A DETERMINATION HAS BEEN MADE THAT THE HAZARDOUS WASTE CONTAINS LESS THAN 500 PPM OF VOCS, ANSWER THE FOLLOWING QUESTIONS.**	
a.		How was waste determination done? Using Knowledge or Sampling? - Ref 40 CFR 265.1084 (264.1083)	
b.		If knowledge was used, is there any documentation on file?	
c.		Is it adequate?	
d.		If sampling was used, does the facility have a written sampling plan?	
e.		If facility used sampling, was the sampling done by an EPA approved method? Which method?	
f.		Has the waste stream changed since the initial waste determination was done which would cause the character of the waste to change or to exceed the threshold levels for applicability of Subpart CC?	
g.		If so, was a new waste determination done? If YES, repeat 4(a)-(e)	
	✓	**CONTAINERS:** Ref. 40 CFR 264/5.1087 **LIGHT LIQUID SERVICE:** For a hazardous waste to be in light liquid service, the vapor pressure of one or more of the organic constituents in the material must be greater than 0.3 Kilopascals at 20 degrees C and the total concentration of pure organic constituents having a vapor pressure greater than 0.3 kilopascals at 20 degrees Centigrade is equal to or greater than 20 percent by weight.	
1.	✓	**LEVEL ONE:** There should be no waste stabilization. Containers must be > 0.1 cubic meters (26.4 gal) and < or = to 122 gallons . If the organic waste is not in light liquid service, it can be above 122 gallons.	
a.	✓	**OPTION 1-** The container meets DOT specifications.	
b.	N/A	**OPTION 2-**Use a cover and closure device on the container and ensure that there are no visible gaps in the interior of the container or holes in the covers.	

ATTACHMENT 4

RECEIPT FOR DOCUMENTS AND SAMPLES

(One Page)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
Industrial Laminates/Norplex Inc.
Facility Address
665 Lybrand St., Postville, IA 52162

Documents Collected? YES X (list below) NO___

Samples Collected? YES___ (list below) NO X Split Samples: YES___ NO___

Documents/Samples were: 1)Received no charge X 2)Borrowed___ 3)Purchased___

Amount Paid: $_____ Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

==========

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

1. Facility layout figure (2 pages)
2. Training Documentation (7 pages)
3. Uniform Hazardous Waste Manifests: 001937481 JJK, 000126802 VES; 000189833 CEX, and 000115176 VFS (4 Pages)
4. Hazardous Waste Log (2 pages)
5. SPCC Plan (20 pages)
6. Emergency Response Plan (10 pages)

Facility Representative (print)	Signature/Date
Scott Lovern	5-17-07
Inspector (print)	**Signature/Date**
Ann V. Galbraith, Tetra Tech EM Inc.	05/17/07

U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101

(rev:1/20/93)

ATTACHMENT 5

CONFIDENTIALITY NOTICE

(One Page)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name Industrial Laminates/Norplex Inc.	
Facility Address 165 Lybrand St., Postville, IA 52162	
Inspector (print) Ann Y. Galbraith, Tetra Tech FM Inc.	05/17/07
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date
Scott Lovern	5-17-07

I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested:

_____

_____

_____

_____

ATTACHMENT 6

NOTICE OF PRELIMINARY FINDINGS

(One Page)

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Industrial Laminates / Norplex Inc.
ADDRESS: 165 Vbrand St.
Postville, IA 52162
EPA ID NUMBER: IAD073489288 **DATE:** 05/17/07

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Facility failed to label 5 containers of universal waste lamps as "Universal Waste-Lamps," "Waste Lamps," or "Used Lamps" as required by 40 CFR 273.14(e).
2. Facility failed to keep 4 containers of universal waste lamps closed as required by 40 CFR 273.13(d)(1).
3.
4.
5.
6.
7.

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Scott Logan **TITLE:** HS&E Manager

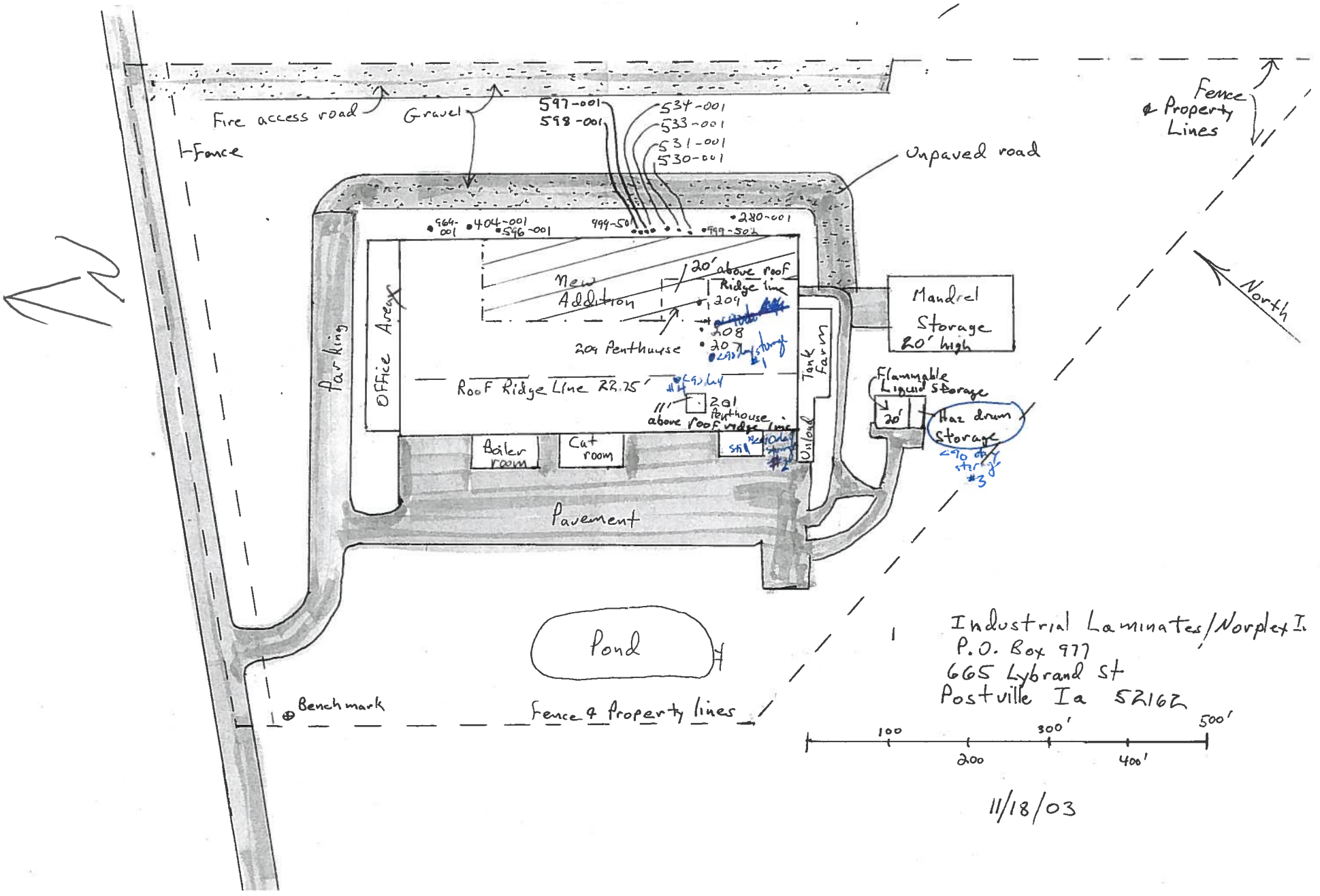
SIGNATURE: Scott Logan

This document was prepared by Ann V. Galbraith, Tetra Tech EM Inc.

ATTACHMENT 7

FACILITY SITE PLAN

(One Page)



Attachment 7 Page 1 of 1

ATTACHMENT 8

PHOTOGRAPHIC DOCUMENTATION

(Five Pages)

PHOTO LOG

Facility Name / City: Industrial Laminates/Norplex Inc.
665 Lybrand Street
Postville, Iowa 52162
Facility ID #: IAD073489288
Date : May 17, 2007
Photographer: Ann Y. Galbraith
Type of Camera: Olympus C-4000, Serial # 237C13059
Digital Recording Media: Flashcard
All digital photos were copied by: Ann Galbraith on May 18, 2007
All digital photos were copied to: Tetra Tech EM Inc. desktop computer
Original copy is stored in: Tetra Tech EM Inc's internal office server. Digital photos were downloaded to the server by Ann Y. Galbraith. No changes were made in the original image files prior to storage on the server.

Report Photo #	Photographer	Date	Approx. Time	File Name (ILNXXX.jpg)	Description
1	Ann Galbraith	05/17/07	AM	001	This photograph shows the less-than-90-day hazardous waste storage area in the still room.
2	Ann Galbraith	05/17/07	AM	002	This photograph shows the facility solvent distillation unit.
3	Ann Galbraith	05/17/07	AM	003	This photograph shows the outside less-than-90-day hazardous waste storage area.
4	Ann Galbraith	05/17/07	AM	004	This photograph shows containers of universal waste lamps open and not labeled.
5	Ann Galbraith	05/17/07	AM	005	This photograph shows another view of open containers of universal waste lamps.
6	Ann Galbraith	05/17/07	AM	006	This photograph shows the universal waste lamp containers from Photographs 4 and 5 closed and labeled.
7	Ann Galbraith	05/17/07	PM	007	This photograph shows another view of the universal waste lamp containers after they have been closed and labeled.

Industrial Laminates/Norplex Inc.
665 Lybrand Street
Postville, Iowa

TETRA TECH PROJECT NO. G9022.0.07.009.02.02	DESCRIPTION	This photograph shows the less-than-90-day hazardous waste storage area in the still room.	1
	CLIENT	USEPA Region 7	DATE 05/17/07
DIRECTION: Interior	PHOTOGRAPHER	Ann Y. Galbraith	

TETRA TECH PROJECT NO. G9022.0.07.009.02.02	DESCRIPTION	This photograph shows the facility solvent distillation unit.	2
	CLIENT	USEPA Region 7	DATE 05/17/07
DIRECTION: Interior	PHOTOGRAPHER	Ann Y. Galbraith	

Industrial Laminates/Norplex Inc.
665 Lybrand Street
Postville, Iowa

TETRA TECH PROJECT NO. G9022.0.07.009.02.02	DESCRIPTION	This photograph shows the outside less-than-90-day hazardous waste storage area.	3
	CLIENT	USEPA Region 7	DATE 05/17/07
DIRECTION: East	PHOTOGRAPHER	Ann Y. Galbraith	

TETRA TECH PROJECT NO. G9022.0.07.009.02.02	DESCRIPTION	This photograph shows containers of universal waste lamps open and not labeled.	4
	CLIENT	USEPA Region 7	DATE 05/17/07
DIRECTION: Interior	PHOTOGRAPHER	Ann Y. Galbraith	

Industrial Laminates/Norplex Inc.
665 Lybrand Street
Postville, Iowa

TETRA TECH PROJECT NO. G9022.0.07.009.02.02	DESCRIPTION	This photograph shows another view of open containers of universal waste lamps.	5
	CLIENT	USEPA Region 7	DATE 05/17/07
DIRECTION: Interior	PHOTOGRAPHER	Ann Y. Galbraith	

TETRA TECH PROJECT NO. G9022.0.07.009.02.02	DESCRIPTION	This photograph shows the universal waste lamp containers from Photographs 4 and 5 closed and labeled.	6
	CLIENT	USEPA Region 7	DATE 05/17/07
DIRECTION: Interior	PHOTOGRAPHER	Ann Y. Galbraith	

Industrial Laminates/Norplex Inc.
665 Lybrand Street
Postville, Iowa

TETRA TECH PROJECT NO. G9022.0.07.009.02.02	DESCRIPTION	This photograph shows another view of the universal waste lamp containers after they have been closed and labeled.	7
	CLIENT	USEPA Region 7	DATE 05/17/07
DIRECTION: Interior	PHOTOGRAPHER	Ann Y. Galbraith	

ATTACHMENT 9

TRAINING DOCUMENTATION

(Nine Pages)

IL/Norplex Hazardous Waste Training

40 CFR.16

New/Continuing Employee Training:
New employees, or others transferred into a job that includes working with hazardous waste shall receive classroom and/or on-the-job training to ensure compliance with 40 CFR 264.16. This training shall be completed within 6 months of being placed in that position. A review of initial Hazardous Waste training shall be conducted yearly.

HS&E manager	Introductory training: Within 6 months of starting position, attend an off-site course that covers the following RCRA hazardous waste topics: Overview, solid & hazardous waste identification, generator requirements, site management, RCRA compliance and enforcement, prevention, hazardous waste/materials transportation requirements, training requirements, packaging, emergency response.	264.16,d, 3
HS&E manager	Continuous training: Yearly attend a course and/or review training material similar to that required for introductory training.	
Treater II Operator Treater I Operator Treater Lead Receiving **Note:** Employees are not to work in an unsupervised situation until their training has been completed.	Introductory training: 1. Overview of RCRA and how it applies to Norplex hazardous waste. 2. Typical makeup of Norplex production chemicals and when and why they would become hazardous waste. 3. Health hazards associated with handling Norplex materials including hazardous waste. 4. Norplex procedure for handling hazardous waste, hazardous waste drum storage and accumulation locations, drum labeling requirements, and shipping requirements. 5. Rules covering 90-day storage, and satellite accumulation labeling. 6. Response to spills, including hazardous waste. 7. Response to fires that may include hazardous waste materials.	
Treater II Operator Treater I Operator Treater Lead Receiving	Continuing training: 1. Overview of RCRA and how it applies to Norplex hazardous waste. 2. Typical makeup of Norplex production chemicals and when and why they would become hazardous waste. 3. Health hazards associated with handling Norplex materials including hazardous waste. 4. Norplex procedure for handling hazardous waste, hazardous waste drum storage and accumulation locations, drum labeling requirements, and shipping requirements. 5. Rules covering 90-day storage, and satellite accumulation labeling. 6. Response to spills, including hazardous waste. 7. Response to fires that may include hazardous waste materials.	
Receiving- Hazardous waste shipment	In addition to the above listed training, new and continuous training will include instruction in the preparation of hazardous waste drums for shipment off site.	

Hazardous waste employees job titles

Job title	RCRA job description
HS&E Manager	Responsible for training employees who may be involved in creating, storing, or handling hazardous waste while working at the plant. Also responsible for training personal for contingence response including spills and fire. Oversee the plants RCRA compliance. Oversee the storage and shipment of all hazardous materials at/from the plant.
Receiving	Applies shipping labels to hazardous waste drums, moves drums to 90-day storage area, loads truck for hazardous waste shipments. Assists HS&E manager in inspection of stored hazardous waste.
Treater II Operator	The treater operator may be asked to place spent production chemicals into hazardous waste drums. He/she may assist in the maintenance of the satellite accumulation and 90 day storage areas. May assist in spill response in the treater area. May place label/accumulation date on drum as appropriate. Ancillary training includes respirator usage, and hazardous communications.
Treater Lead	Oversees placement of spent production chemicals into hazardous waste drums. He/she oversees the maintenance of the treater satellite accumulation and 90 day storage areas, as well as hazardous waste spill response in the plant area. Oversees placement of label/accumulation date on drum as appropriate. Ancillary training includes incipient fire response, respirator usage, and hazardous communications.
Treater I Operator	Places spent production chemicals into hazardous waste drums. He/she maintains the satellite accumulation and 90 day storage areas. Would respond to spill's in the treater area. May place label/accumulation date on drum as appropriate. Ancillary training includes respirator usage, and hazardous communications. May also include incipient fire response training if on the emergency response team.
Compounder	The compounder mixes batches of chemicals for production purposes. He/she supervises the unloading of chemicals delivered to the work site, properly stores hazardous waste drums, collects spent solvents from the cleaning process, and responds to spill emergencies. May place label/accumulation date on drum as appropriate. Ancillary training includes respirator usage, and hazardous communications. May include incipient fire response if on the emergency response team.

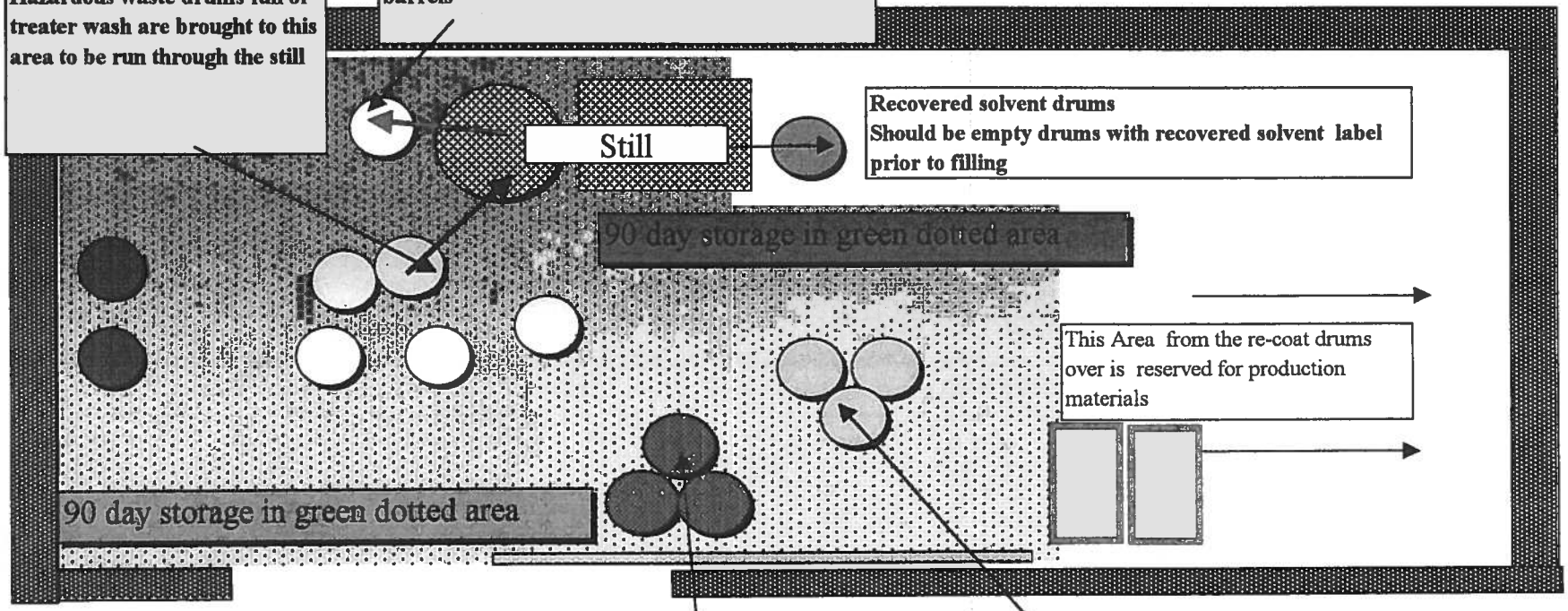
264.16,d,2

Norplex Hazardous waste Job titles

HS&E manager	Scott Loven
Receiving	Daryl Szabo, Dennis Hesse
Treater II Operator	Lorna Jones, Paul Kuesner, Kathy Wagner, Michael Einck, , Charlotte Hallberg, Marty Miller, Peter Plagman, William Evans, Earl Hendry, Dennis Hartson, Teresa Loftsgard, Darren Larson, Earl Gibson, Patty Duvel
Treater lead	Darin Walch, Jerry Bissell, John Elledge
Treater I Operator	Terry Mc Nally, Alphonso Rios
Compounder	Roger Huinker, Darin Berg, Duane Koenig

264.16,d, 2

Still Room



Hazardous waste is staged in this area to be moved to the outdoor storage shed with other drums of waste. There should be no more than four full drums in this area at a time.

Empty or partially filled drums waiting to be recycled back to treaters, or to receive still scrap.

Hazardous waste requirements for 90 day area.

1.) All drums with Haz waste must have a Haz waste label that tells the content of the drum, and the date you started to fill the drum.

2.) All drums with more than 1 inch of material in them must have a label with the date that the drum was originally started.

3.) All empty drums (those with less than 1 inch of residual material) must have the label blacked out, removed, or covered over before they leave this room.

4.) Don't cross out anything on the label. If you replace the label use the original date from the old label.

Attachment 7 Page 4 of 9

RCRA/Hazardous Waste Training Test 2006

_____Name

1. **When does process material become hazardous waste?**
   a. When it is no longer usable in production without being treated?
   b. When it is pumped out of the dip pan and into a drum?
   c. When it meets the RCRA definition of hazardous waste?
   d. All of the above.
   e. Both A and C of the above.

2. **A Label with the words "Hazardous Waste" should go on a drum when,**
   a. The drum is full.
   b. Before hazardous waste is first added to the drum.
   c. Before the end of your shift.
   d. Within three days of the drum being filled.

3. **Hazardous waste containers in satellite accumulation areas such as the lab,**
   a. Must be moved to a 90-day storage area within 5 days of being filled.
   b. Must have a label with the words "Hazardous Waste" on it.
   c. Should be dated when hazardous waste is first added to the drum.
   d. All of the above.

4. **All hazardous waste drums in a 90 day hazardous waste storage area must:**
   a. Have a "Hazardous Waste" label.
   b. Must be dated when hazardous waste is first added to the drum
   c. Must be picked-up and removed from site within 90 days of when hazardous waste is first added to the drum.
   d. Be placed so that the label is easily viewable.
   e. All of the above.

5. **If today's date was 7/15/2006, and you were examining a drum with the date 4/20, you would consider the date to be within the 90-Day limit for storage of hazardous waste.**
   a. Yes
   b. No
   c. Don't know

6. **A drum is RCRA empty (No longer considered to contain hazardous waste) when**
   a. The hazardous waste label has been painted over.
   b. Two thirds of the material in the drum has processed through the still.
   c. There is less than inch of material remaining in the bottom of the drum.

7. **It is all right to mix wastes from different waste streams.** (T) (F)

8. **A hazardous waste drum in a 90-day accumulation area should be dated as soon as it is filled.** (T) (F)

9. **It is OK to leave the bungs out when you are not adding hazardous waste to the drum/and or are not in the immediate vicinity.** (T) (F)

10. **When you add non-hazardous waste materials to a drum containing hazardous waste, all the material in the container is considered hazardous waste.** (T) (F)

11. **A new label with a new date should be applied when reusing a drum that is not RCRA empty.** (T) (F)

12. **It is OK to use a drum with a hole in the seam as long as the hole is near the top, and you don't fill the drum past the hole.** (T) (F)

13. **The primary characteristic of our waste that makes it hazardous is its flammability.** (T) (F)

14. **It is OK to use product drums for shipping hazardous waste.** (T) (F)

15. **The water we pump from the remediation well is considered to be hazardous waste, and should be treated the same as our other hazardous waste.** (T) (F)

16. **All open drums of hazardous waste should be grounded.** (T) (F)

Examine our hazardous waste storage here at Norplex. List 5 or more different kinds of things we are doing that are wrong or right according to RCRA. List below and return to Scott

2006 RCRA Training

FA	Axmear	Fred
WB	Barr	Warren
TB	Benson	Tom
DB	Berg	Darren
JB	Bissell	Jerry
RB	Bries	Rod
PD	Duvel	Patty
M. E	Einck	Michael
JE	Elledge	John
BF	Fosdal	Bob
DG	Gordon	Dean
CH	Hallberg	Charlotte
DH	Hartson	Dennis
RH	Heins	Rick

EH	Hendry	Earl
DH	Hesse	Dennis
GH	Hooper	George
RH	Huinker	Roger
GJ	Jennings	Gaylon
LJ	Jones	Lorna
JJ	Joyner	Jeff
PK	Kuesner	Paul
DL	Larson	Darren
TL	Loftsgard	Teresa
TM	Mc Nally	Terry
DM	Miller	Don
BM	Murphy	Brian
BN	Nichols	Brenda
SK	Susan Koenig	

PP	Plagman	Peter
AR.	Reicks	Al
AR	Rios	Alphonso
DR.	Roffman	Dan
SS	Schultz	Stan
DS	Shaffer	Daren
DS.	Szabo	Daryl
BT	Thomas	Brian
ST	Thurn	Shawn
LT	Tieskoetter	Les
JV	Valley	Jeff
KW	Wagner	Kathy
DW	Walch	Darrin
LW	Wolfs	Luke

The above listed people need to attend RCRA (Hazardous waste training) at one of the following times.

DG Deanna Griancaspro

SI Saby Indrasenan

3ed shift	6:30 am-7:30 am on June 28th or June 29th
1st shift	1:00 pm-2:00 pm on June 28th or June 29th
2nd shift	4:00 pm-5:00 pm on June 28th or June 29th

Supervisors, please schedule your people so that 1/2 will attend each day.

2003 RCRA Training

SI Ichshuk Sergy Storm Water PP

	Axmear	Fred
TB	Benson	Tom
	Bissell	Jerry
RB	Bries	Rod
CC	Crawford	Chris
M.E	Einck	Michael
J.E.	Elledge	John
	Evans	William
	Fosdal	Bob
	Gordon	Dean
	Hallberg	Charlotte
KH	Harris	Klel
RH	Heins	Rick
DH	Hesse	Dennis
BH	Holliday	Baron

GH	Hooper	George
RH	Huinker	Roger
	Jennings	Gaylon
LJ	Jones	Lorna
	Jones	Justin
	Joyner	Jeff
DK	Kuesner	Paul
DL	Larson	Darren
WH	Larson	Darren
TL	Loftsgard	Teresa
TM	Mc Nally	Terry
DM	Miller	Don
CM	Miller	Craig
	Monroe	Al
	Murphy	Brian

PP	Plagman	Peter
	Reicks	Al
	Rios	Alphons
Dr.	Roffman	Dan
B.S.	Schroder	Brian
	Schultz	Stan
DS	Shaffer	Daren
DS	Szabo	Daryl
MT	Thornton	Marjorie
	Thurn	Shawn
Les	Tieskoetter	Les
KW	Wagner	Kathy
DW	Walch	Darrin
DW	Wille	Dave
LW	Wolfs	Luke

The above listed people need to attend RCRA (Hazardous waste training) at one of the following times.

(KH) Hepperle Ken

BERG BARIN

D.S. Duane Koenig

3ed shift	7:00 am-8:00 am on December 8th or December 9th
1st shift	2:00 pm-3:00 pm on December 8th or December 9th
2nd shift	4:00 pm-5:00 pm on December 8th or December 9th

Supervisors, please schedule your people so that 1/2 will attend each day.

Wed.

2003 RCRA Training

TB	Benson	Tom
JM	Bissell	Jerry
R.B.	Bries	Rod
BF	Fosdal	Bob
DH	Hesse	Dennis
BH	Holliday	Baron
TH	Holthaus	Tom
RH	Huinker	Roger
GJ	Jennings	Gaylon
KJ	Johanningmeier	Kathy
LJ	Jones	Lorna
MEE	Einck	Mike

PK	Kuesner	Paul
SL	Lansing	Shelby
DL	Leibold	Dan
TM	Mc Nally	Terry
MM	Miller	Melita
MM	Miller	Marty
CM	Miller	Craig
AM	Monroe	Al
DP	Palas	Dave
AR	Reicks	Al
DR	Roffman	Dan
PC	Cahoon	Perry

DS	Shaffer	Daren
JS	Smith	Jim
DS	Szabo	Daryl
	Thurn	Shawn
Les	Tieskoetter	Les
TW	Wagner	Toni
DW	Walch	Darrin
DW	Wille	Dave
PW	Winters	Roger
LW	Wolfs	Luke
KW	Wagner	Charli
FEA	AXMEAR	FRED

The above listed people need to attend RCRA (Hazardous waste training) at one of the following times.

3ed shift	6:45am-7:45am July 22 or July 23
1st shift	1:pm-2:pm July 22 or July 23
2nd shift	4:00-5:00 pm July 22 or July 23

Supervisors, please schedule your people so that 1/2 will attend each day.

ATTACHMENT 10

RCRA CONTINGENCY PLAN

(31 Pages)

Distribution List

	Copy Number
Master Copy- In HS&E Managers office	1
Maintenance office	2
Emergency Response cart	3
Iowa Emergency Response Unit, IDNR, 401 SW 7th Street, Suite 1, Des Moines, IA 50309	4
Postville Fire Department, Postville Iowa 52162	5
Postville Police Department, Postville Iowa 52162	6
Veterans Memorial Hospital, 40 1st street, Waukon IA 52172	7
Allamakee County Emergency Response Comity	8

ILNORPLEX

EMERGENCY RESPONSE PLAN

Purpose

The Emergency Response Plan is to provide organization and administrative guidance to prevent or minimize damage to company personnel and property in the event of an emergency or disaster. For the purpose of this plan an emergency can be defined as follows:

1. An accident causing fatal or severe injuries;
2. Unexpected operational incidents which may result in fires or explosions;
3. Forces of nature such as severe windstorm, flood, lightning, or earthquake;
4. Any incident which could affect community relations such as accidental release of toxic materials into the atmosphere or local waterways;
5. Deliberate damage from malicious mischief, sabotage, bomb threat, and riots.

All employees in the facility will be familiar with the Emergency Response Plan as follows:

I. Their individual responsibilities for reporting emergencies.

II. The appropriate response when an emergency and/or evacuation are declared.

A review of the above responsibilities will be conducted as a part of the employee orientation and annually there after. All employees who have Emergency Response responsibilities will receive 24 hours of training initially and training adequate to maintain competency annually there after. All training and program reviews will be documented with attendance records maintained for five years.

Emergency Control Organization

When a state of emergency is declared at the Postville Plant, the Emergency Response Organization must be immediately mobilized. Contained within the Emergency Control Organization are assignments for key members of management to insure that immediate decisions are made and carried out in an effective manner.

The Emergency Response Organization is as follows:

Emergency Response Coordinator (ERC)
Scott Loven
2345 Ranch Road
Decorah, IA
563-387-0581

Person in charge (Acts as ERC in absence of ERC)

1st shift
Shawn Thurn 563-539-4626
502 S Egbert
Monona, IA 52159

2nd shift
Gaylon Jennings 563-774-3975
15047 Cedar Road
Wadena, IA 52169

3ed shift
Rod Bries 563-539-4230
15224 Falcon Ave
Monona, IA 52159

Activities of the Emergency Response Organization will be directed from a command center. The primary command center is the Maintenance Shop. The following equipment will be located here:

- At least three radios
- PPE (Each team member has their own personal respirator)
- Copy of this manual
- Copies of MSDS's
- Flashlights

I. Emergency Response Assignments

A. The Emergency Response Coordinator is responsible for the implementation of the Emergency Response Plan in the event of a plant emergency or potential disaster. The Emergency Response Coordinator shall make decisions and initiate appropriate action needed to minimize risk and/or damage to plant personnel, property, and the environment.

B. The Person in Charge, under the direction of the Emergency Response Coordinator, will help administer the Emergency Response Plan and in the absence of the Emergency Response Coordinator be responsible for the implementation of the Plan.

C. The Communications Contact is responsible for all personnel matters growing from or in the course of emergency. S/He will direct all matters relative to employee scheduling, casualty reports, public relations, in-plant welfare, and telephone and radio communications.

D. Public Relations

The Plant Manager, after consultation with the Emergency Response Coordinator, will handle all news releases, including plant bulletins and interviews with the news reporters and photographers. The responsibilities include:

1. To periodically provide the various news media with positive information by telephone before newsmen pick up rumors from outside sources and approach the Company on their own initiative. News media to be contacted should include:

   Radio - KOEL (563) 283-1234
   Newspaper - Postville Herald (563) 864-7331

2. To provide meaningful, non-confidential information.

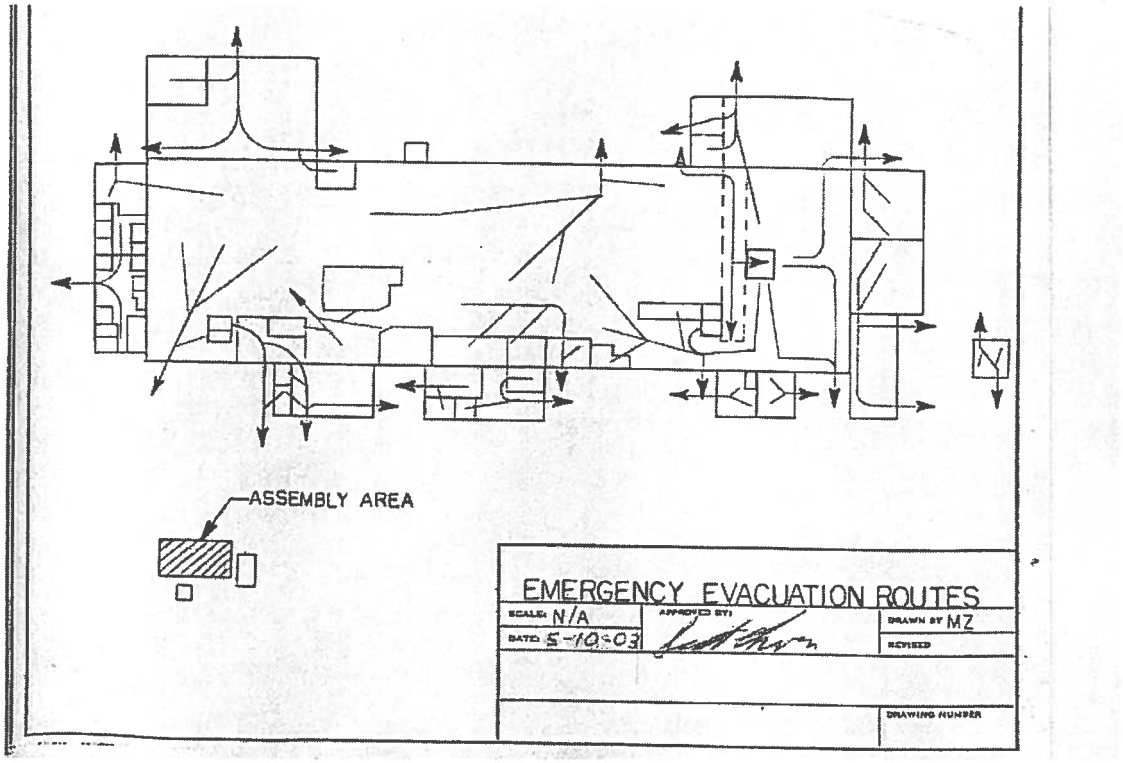
3. To set up periodic news conferences with the press to update available information. No information will be given out prior to the news conferences nor will newsmen and photographers be allowed to enter the plant.

E. Employee Welfare

Assistant Person in Charge (A.P.C) will be responsible for administering to the comfort and well being of employees, including evacuees, disaster workers and the injured. A.P.C. will arrange for preparation and delivery of food and beverages to the first-aid stations, the affected areas, and to the assembly areas.

A.P.C. will provide rescue workers with dry and comfortable clothing as needed. A.P.C. will arrange for necessary blankets, cots, etc. for injured personnel that are brought into the first-aid station or in-plant medical centers. Plant Manager will attend to the details essential to keeping up the morale of the plant personnel.

Below is the Plant evacuation drawing showing multiple exit locations from all parts of the plant.



"You are here" drawings of the above map are posted through out the facility.

Emergency Response Team	*Third shift*	*First Shift*	*Second Shift*
Emergency Response Coordinator	Scott Loven or person listed below	Scott Loven or person listed below	Scott Loven or person listed below
Person in charge:	Rod Bries	Shawn Thurn	Gaylon Jennings
Assistant Person in charge:	Les Tieskoetter	Dan Roffman	Bob Fosdal
Direction:	Darrin Walsh	Cheryl Thornton	Jim Russett
Headcount:	Ron Duval Donna Erickson	Lowell Houg Don Gullickson	Karen Heins Steve Smock
Response Team:	Kathy Johanningmeier	Al Monroe	Luke Wolfs
	Baron Holliday	Jerry Bissell	Melita Miller
	Dave Wille	Clinton Peterson	Daren Shaffer
	Terry McNally	Dave Palas	Marty Miller
	Al Reicks	Jim Smith	Tom Holthaus
	Tom Benson		

EMERGENCY RESPONSE TEAM:

Person In Charge: Will evaluate the severity of the situation, and direct remainder of team in the appropriate response to that emergency. Will decide what outside resources if any are needed. **Primary** consideration should be given to the safety and well being of plant personnel including the ER team. **Secondary** consideration should be given to containing or minimizing damage to plant equipment or material.

Assistant Person In Charge: Shall report to emergency taking direction from Person In Charge. Will fill in as Person In Charge in his absence.

Direction: Shall report to emergency and take direction from Person In Charge. If directed to call outside help (Fire, Ambulance Etc.), Direction Person shall place call then report to parking lot and guide outside response teams to nearest door. When outside help arrives notify Person In Charge by radio. Give radio to person in charge (Fire chief etc.) of the outside response team.

Headcount: Person shall first retrieve the radio, the list of employees, and the flashlight from the press office, and then report to area north of fire pump house. When employees report to area divide them into groups by dept. and designate a person from each dept. to take a Headcount. The Headcount person shall report by radio to the Person In Charge immediately.

All Other Employees: Report emergency over PA system **(Dial 477).** If emergency requires evacuation from all or part of the plant, say so. When evacuating, shut down equipment, then exit plant through nearest door and proceed to northwest corner of property, assemble by department and take Headcount. Wait for further instructions from Person In Charge.

Fire/ Explosion	Spill	Name	Work	Home
If needed	If needed	Postville Fire Dept.	911	
If needed	If needed	Postville police Dept.	911	
If needed	If needed	Waukon Hospital	(563) 568-3411	
Yes	Yes* primary	Scott Loven	Ext. 227	(563) 387-0581
Yes	Yes *primary	Jim Gilbert	Ext. 222	(563) 382-2586
Alternate*	Alternate *	Tom Sattler	Ext. 232	(563) 382-4920
Yes	Yes	Dave Lensing	Ext. 209	864-7138
If needed	If needed	Dr. McMullan	864-7221	

*** If spill is a reportable quantity Scott, Jim, or Tom as alternate shall call National Response Center at 800-424 8802**

FIRE/EXPLOSION

Dial 477 Siren will sound, stay on phone and announce what and where emergency is. Follow the direction of the Emergency response team.

SPILL

Contact Emergency Response coordinator. Evacuate area/plant (see above) if spill poses fire, explosion, or inhalation hazard.

EMERGENCY EQUIPMENT AVAILABLE AT THE FACILITY

- **Emergency response cart**
  - 4 SCBA units
  - 4 Class A.B.C. Fire extinguishers
  - 2 sets protective Goggles
  - 1 safety harness
  - 1 100' nylon rope
  - 1 oxygen indicator
  - 2 emergency oxygen kits
  - 2 pair neoprene gloves
  - 2 flashlights
  - 6 air splints
  - 1 L.E.L monitor
  - 1 orange vest
  - 1 fire blanket
  - 1 first aid kit
- **Fire protection**
  - CO_2 system in Treater 1
  - CO_2 system in the Treater wet end area.
  - The entire building is sprinklered per code. The three mains are located in the tank farm, the 301 press room, and the lower woman's rest room
  - There are 138 fire extinguishers located throughout the Facility
  - Incipient level fire fighting hoses

- **<u>Spill Control 4</u> spill control kits are located as follows: 1 in the receiving area, 1 outside of the still room, 1 in the outside barrel storage area, and 1 in the hazardous waste storage area. Spill control kit contents are as follows:**
  - 1 ea over pack drum
  - 2 ea Tyvex Suits
  - 1 ea Flash light
  - 1 ea 15/16" wrench
  - 1 ea Siphon Pump
  - 1 ea Plastic Shovel
  - 2 ea Garbage bags
  - 1 ea tarp
  - 2 ea Bung Wrenches
  - 2 ea pair Neoprene gloves
  - 3 ea 5 gal. Buckets with lids
  - 2 ea pair goggles
  - 2 ea bags Absorbent

<u>EMERGENCIES ON WEEKENDS, HOLIDAYS, OR WHEN PLANT IS NOT IN OPERATION:</u>
Watchmen are immediately to notify the emergency response coordinator and/or one of the Persons in charge" as listed on page 2&6 of this manual.

III. Traffic Control Inside Plant

A. Only authorized vehicles will be allowed to enter the main gate.
B. Employee's cars must be parked in the parking lots, <u>without exception</u>.
C. Ambulances will report to first-aid unless dispatched to the emergency areas by the officer in charge of the emergency units or the plant physician.
D. Emergency vehicles responding to our requests for help will be directed to the scene of the emergency by the safest, most direct route.
E. Service cars, plant trucks, and engineering equipment will be routed as the situation dictates.
F. Traffic congestion at any point cannot be tolerated.
G. Vendors' vehicles will not be allowed to enter the plant, leave the plant, or move within the plant during a state of emergency unless specifically directed by the Emergency Response Coordinator.

IV. Traffic Control Outside Plant

A. Access roadway to the plant must be kept open for passage of emergency vehicles.
B. All employees reporting to work must park in the employees' parking lot.
C. Control of traffic on public roads will not be undertaken by plant or security personnel. For traffic control on public roads, state and local law enforcement officers will be called.
D. Request for outside traffic control aid will be made through the Emergency Response Coordinator.

V. Personnel Evacuation

All personnel not designated as part of the Emergency Response Organization or Emergency Response Team will be evacuated, if necessary, in an orderly manner as outlined in the Evacuation section of this manual. During the early phase of an emergency, a high priority should be given to accounting for all personnel.

VI. Records

The Plant Manager will be responsible for protecting essential plant records should an emergency occur. He should take whatever precautions and actions are necessary to preserve both hard copy records and data in computer storage.

VII. Emergency Shutdown of Utilities and Operating Equipment

The Maintenance Personnel will be responsible for shutdown and restoration of utilities for the general plant and any localized operating equipment that may require shutdown.

EMERGENCY RESPONSE PLAN IMPLEMENTATION

Implementing the "Emergency Response Plan" or "State of Emergency" is a decision that must be made by the:

1) Emergency Response Coordinator
2) Person in charge

When the Emergency Response Team has been summoned to the scene of an emergency, the leader may declare a state of emergency and order area or facility evacuations, equipment shut down, and utility service shut down if necessary.

When the decision to declare an Emergency Response or State of Emergency has been made, the Emergency Response Coordinator will notify all affected personal via the Emergency Response telephone system **(Dial 477)**

All area supervisors shall have the safety of their people as their prime consideration. If the evacuation signal is sounded, supervisors will evacuate their people at once. The supervisor will be sure the evacuation is orderly and that all people are accounted for. Supervisors will check the people when they reach the assembly location to see that all have been evacuated.

Evacuation

When a state of emergency exists in the plant and an evacuation is necessary, the evacuation plan will be put into effect. Upon receiving the evacuation signal, all personnel will leave the building immediately and proceed to the designated assembly area. Personnel will remain in the assembly area until released by their supervisor or given specific assignments.

When a plant evacuation is in effect, the following provisions must be taken:

1. Unauthorized personnel should not be permitted to enter the damage area.

2. All washrooms, locker rooms, offices, and out-of-the-way places should be checked to insure that all persons have been evacuated.

3. Personnel from other departments who may be in the affected areas must be evacuated along with the persons assigned to the areas.

4. Personnel from the office area who may be in the other parts of the plant at the time of an emergency should report to their departmental assembly area immediately.

5. Personnel should not be permitted to return to their work area until the Emergency Response Coordinator has declared the area safe.

6. All visitors will immediately be escorted to front desk and will be accounted for by referencing the log in book.

7. All building, machinery, equipment and rubble will be left as is and guarded, if necessary, until released by the Emergency Response Coordinator except when it obstructs rescue and fire fighting operations.

8. After the evacuation a head count must be made and an effort made to account for all people involved. The shift designated Headcount employee is responsible for verifying all employees are accounted for; the supervisor will report any missing employees to the Person in Charge. The switchboard operator is responsible for bringing the visitor log to the assembly area to assist with visitor accountability.

9. Personnel should be kept in the assembly areas until assigned specific duties, returned to their departments, or released by the supervisor in charge of the area.

Fire and Explosion

In the event of a fire or explosion, the following procedure will be followed:

I. The person who discovers the fire shall do the following:

   1. If the fire is in an incipient stage and the employee has had fire extinguisher training the employee is to extinguish the fire using the available portable fire extinguishers. Report fire to Emergency Response coordinator.

   2. If the fire is too large to control, or the employee is not trained in the use of fire extinguishers the employee is to immediately insure that all persons in the danger area are warned. The employee is to then activate **the Emergency response System (Dial 477)** and then report to the **Emergency Response Team (ERT)** assembly point to brief the ERT on the location and size of the fire. The employee shall then evacuate the facility to their designated assembly area.

II. The ERT will respond to the affected area and bring emergency equipment that may be needed. At the direction of the ERT Leader utilities may need to be deactivated or isolated. If the emergency is such that the plant ERT cannot control the fire, the ERT Leader will call the fire department and activate the Emergency Control Plan. This may include evacuation of the plant per the evacuation plan on page 7.

III. In the event a fire department response is required a member of the ERT will meet the fire department in the driveway or road approaching the plant and direct them to the area of the emergency.

IV. If a fire occurs in the treater the ERT should secure the treater (ventilation, web travel, etc.) and manually discharge the CO_2 extinguishing system (if it has not yet discharged). The ERT member should assure that all doors are closed and evacuate the area.

V. In the event the sprinkler system is activated due to a fire the riser valve must not be turned off until the ERT leader or fire department has determined the fire is extinguished.

VI. If the emergency coordinator determines that the facility has had a release or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows: Notify Postville police and Fire departments via 911 and if appropriate, the National Response Center at 800-428-8802. BE prepared to give the following information:

   - Name and facility address
   - Time & type of incident (eg fire, release)

- Name and quantity of materials involved to the extent known
- The extent of injuries
- Possible hazards to human health, or environment, outside the facility

RCRA Hazardous Waste Contingency Plan

1. The purpose of this plan is to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The contingency plan should be invoked whenever a hazardous waste emergency could threaten human health or the environment.
2. The Hazardous Waste Contingency plan will follow the Emergency Response plan as detailed in other parts of this procedure.
3. The Postville Fire and Police departments have agreed to support ILNorplex in responding to any disaster that may threaten our facility including fire and explosion. Veterans Memorial Hospital has an emergency response committee that is familiar with our facility and the kind of injuries that we might present to them in an emergency.
4. Names, addresses, and phone numbers fore all persons qualified to act as emergency response coordinator are listed on page 2 of this manual.
5. This procedure is distributed per the list located on page 1 this procedure.
6. This procedure shall be reviewed and amended if necessary per 49CFR265.54
7. Those qualified to act as Emergency Response Coordinator are as listed on page 2 in this procedure.
8. Emergency procedures:
9. Follow the same procedure for hazardous/flammable liquids emergencies detailed else ware in this manual with the following additions:
10. Immediately after an emergency, the emergency coordinator must provide for storing, or disposing of recovered waste, contaminated soil or surface water, or any material that results from a release, fire, or explosion at the facility.
11. Incompatible wastes/materials must be kept separate during cleanup and disposal. All emergency equipment used for the clean up must be rendered fit for use or replaced before operations in that area may resume.
12. Following an emergency involving hazardous waste that requires the implementation of the contingency plan, the emergency response coordinator shall notify the appropriate authorities per 40cfr.265.56(d)

Spill Response

In order to ensure timely and effective response to hazardous material spills, all plant personnel must have an awareness of, and involvement in, spill response situations.

Most plant personnel will only be involved in recognizing a spill and reporting it immediately to the lead member of the Emergency Response Team. To that extent, it is not appropriate for any plant personnel to be involved beyond this level unless they are a member of the Emergency Response Team and have been properly trained in emergency response situations.

Refer to the SPCC, Oil and Chemical Spill Plans for further details regarding spill response.

- Possible hazards to human health, or environment, outside the facility

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Refer to the SPCC, Oil and Chemical Spill Plans for further details regarding spill response.

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

Norplex-Micarta

665 Lybrand Street
POSTVILLE, IOWA
563-864-7321

November, 2006

PREPARED BY:

12-1-06

Scott Loven, Health Safety &
Environmental Quality Manager

Reviewed according to 40 CFR 112 and certified by:

12/1/06

Stephen Robinson, P.E.
Engineered Projects and Technologies
Licensed Professional Engineer

Jim Gilbert
Plant Manager

Oil and Chemical SPCC Plan
Norplex-Micarta
Postville, Iowa

1.0 Introduction

1.1 Norplex-Micarta Environmental Control Policy

Norplex-Micarta is committed to the protection of the environment and has integrated this concern at the operational level into the training and work practices of each employee in order to exert maximum effort to prevent the occurrence of any oil or hazardous chemical spill and to ensure compliance with applicable regulations. To accomplish this objective, this facility has developed an Oil and Chemical Spill Control and Countermeasure (SPCC) plan. This plan identifies facility drainage, bulk storage tank inventory, facility transfer operations, facility tank car loading and unloading controls, documentation for inspections and maintenance of records, security, personnel training and spill prevention. This SPCC Plan describes the operational procedures implemented by the Postville Plant to control oil and/or hazardous chemical spills.

This plan is designed to serve as the management tool to identify the policies and procedures required to effectively control, manage, mitigate and ultimately prevent spills at the facility.

1.2 Regulatory Criteria

Requirements pertaining to accidental or intentional discharges of oil and hazardous substances that were consulted in the development of this Plan include the EPA regulation on Oil Pollution Prevention at 40 CFR 112. This regulation outlines the requirements for agency notification and record keeping in the event of an oil or hazardous chemical spill.

1.3 Postville SPCC Management and Organization

The Postville plant management is committed to the implementation and maintenance of this SPCC Plan. Plant spill response operating procedures require immediate containment, a determination of notification requirements, an assessment of hazards and an evaluation of clean-up actions necessary to abate the spill.

Responsible parties for spill control at the facility include Jim Gilbert, Plant Manager, and Scott Loven, HS&EQ Manager. The designated Emergency Response Coordinators for the facility are as listed in the Emergency Response Manual.

The SPCC Plan shall be amended as required to reflect any significant modifications to the facility. Modifications to the Plan shall be required when:

- Applicable regulations are revised;
- The SPCC plan fails in the event of an emergency;
- Significant design changes effecting the potential hazards occur; and
- The list of emergency equipment or Emergency Response Coordinators changes.

Major amendments are to be recertified by a professional engineer. This Plan shall undergo periodic review as required in 40 CFR 112.5. Copies of the plan shall be maintained at the facility at all times.

1.4 Spill Reporting

Norplex-Micarta Postville Plant policy for emergency response specifies that it is the responsibility of the HS&EQ Manager to report immediately any spill of a hazardous substance equal to or in excess of the "reportable quantity" (40 CFR 302.4) threshold, other than a Federally Permitted release, to the National Response Center at (800) 424-8802. In addition, local reporting of any substantial risk information is to be made to:

National Response Center (NRC)

(800) 424-8802

State Environmental Regulatory Agency

Iowa Department of Natural Resources
7900 Hickman Road Suite 1
Urbandale, IA 50322
(515) 281-5145

Iowa Department of Natural Resources
817 West Fayette St.
Manchester, Iowa 52057
(319) 927-2640

State Emergency Response Commission

Iowa Emergency Response Unit
IDNR
401 SW 7th St., Suite 1
Des Moines, IA 50309
(515) 281-6175

Catastrophic Spill Contact

Enviromark
7301 Vine Street Court
Davenport, Iowa 52806
(563)-388-9100

Local Emergency Planning Committee

(563) 586-2996

1.5 Spill History

There have been no oil or hazardous chemical spills at the Postville facility in the past 12 months.

2.0 Facility Description

2.1 Site Description and Facilities

The facility is located on 20 acres in Postville, IA. The site topography is relatively flat with surface drainage primarily towards the southeast.

The site consists of a main building, which includes the manufacturing area, the bulk storage tank farm, the maintenance shop, and a quality control laboratory and office area. Also located on site is a building used for drummed raw material and waste storage. Cooling water used on site drains to a 120,000-ft3 pond which discharges to Robert's Creek under the provisions of an NPDES permit.

A layout of the facility is attached

Adjacent property includes a private farm and feed mill to the south.

2.2 Process Description

The ILNorplex, Postville, IA facility manufactures industrial laminate boards and tubing. Various petroleum based liquids and other chemicals are used directly in, and in support of, the manufacturing process. Natural gas is used to fire curing ovens, hydraulic oil is used to operate presses and liquid solvents and solvent based resins are the raw materials used in the laminate manufacturing process.

3.0 Facility Drainage

Site surface drainage is generally toward the southeast. Drainage points include the NPDES permitted outfall from the cooling water pond and 4 culverts used to carry storm water from the northeast side of the property to Robert's Creek. Discharge of storm water from the culverts is approved via a General Storm Water Permit.

3.1 Storm water Management

As mentioned above, a General Storm Water Discharge Permit covers storm water discharge from the site. The provisions of that permit require that a Storm water Pollution Prevention Plan (PPP) be developed to help prevent the discharge of

contaminated water. The provisions of the Storm water PPP are covered in another document.

3.2 Storage Area Drainage

With the exception of the hydraulic oil tank all chemical storage and loading and unloading areas are located inside buildings. The hydraulic oil tank is located outside in a diked area. The tank has a capacity of 2,000 gallons and the dike has a containment capacity of 6,390 gallons. The containment dike is equipped with a drain valve that is maintained in the closed position except when it is necessary to open it to remove accumulated rainwater. However, prior to opening the valve the accumulated water is visually checked for the presence of oil. If oil is noted it will be picked up with absorbent materials prior to discharge. If no oil is noted the drain valve is opened and the material is discharged to the ground outside the dike. Records of the drainage are maintained by maintenance.

4.0 Chemical Storage

4.1 Tank Management

The Postville plant uses both indoor and outdoor bulk storage tanks for holding raw materials and process chemicals. All tanks are located within secondary containment, which is designed to hold the entire contents of the largest tank plus 10 percent. All tanks are made of carbon steel, which has been determined to be appropriate for the materials stored in the tanks. A listing of the tanks, the materials stored, the location and the capacity is as follows:

CHEMICAL STORAGE TANKS AND CONTAINERS

ID/Location	TANK /SYSTEM	CAPACITY (Gal.)	DATE INST.	CONTENTS	Construction Material	CONTAINMENT TYPE	CONTAINMENT Gal
952-001 In Boiler room	Waste Oil tank	1,500 gal	1983	Waste Hyd. Oil	STEEL	2	1772
308-001 South, Outside of boiler room	New Oil Tank	2,000 gal	1991	New Hyd. Oil	STEEL	2	6390
Maintenance shop	Main Transformer	600 gal		Hydraulic Oil	STEEL	2	1039
Unload area SE end of building	Tank Truck (unload)	2,000 gal		Hydraulic Oil	STEEL	2	65828
301/302/305 Main plant	Press Hydraulic	500 gal each	1974	Hydraulic Oil	STEEL	2	1000 minimum each
303/304 Main plant	Press Hydraulic	800 gal combined	1974	Hydraulic Oil	STEEL	2	1000 minimum each
306 Main Plant	Press Hydraulic	700 gal each	2004	Hydraulic Oil	STEEL	2	1000 minimum each
Upper Compound Room	11 mixing tanks	2000 gal ea	1991	Resin – Solvent mixture	STEEL	1	NA
Lower Compound Room	36 portable mixing tanks	100-600 gal	NA	Resin – Solvent mixture	STEEL	1	NA

101-001 Tank Farm	Tank 101	7,500 gal	1991	Phenolic Resin	STEEL	2	56k gal
102-001 Tank Farm	Tank 102	9,000 gal	1991	Phenolic Resin	STEEL	2	56k gal
103-001 Tank Farm	Tank 103	9,000 gal	1991	Phenolic Resin	STEEL	2	56k gal
104-01 Tank Farm	Tank 104	7,500 gal	1991	Saniticizer 160	STEEL	2	65k gal
105-001 Tank Farm	Tank 105	5,000 gal	1991	Ethanol	STEEL	2	56k gal
106-001 Tank Farm	Tank 106	4,500 gal	1991	Toluene	STEEL	2	65k gal
107-001 Tank Farm	Tank 107	7,500 gal	1991	Acetone	STEEL	2	65k gal
108-001 Tank Farm	Tank 108	7,500 gal	1991	DMF	STEEL	2	65k gal
109.001 Tank Farm	Tank 109	7,500 gal	1991	PM	STEEL	2	65k gal
110-001 Tank Farm	Tank 110	1,500 gal	1991	IPA	STEEL	2	65k gal
550-001 East of treaters	Hot Oil dip tank	250 gal	2004	Oil	STEEL	2	Note 1
999-016 Still room	Tank 122A	6,000 gal	1991	Epoxy Resin	STEEL	2	9,589 Gal
993-001 next to Generator	Transformer	600 gal		Mineral Oil	STEEL	2	1,736 Gal
993-002 next to filter press room	2500 KVA Transformer	734 Gal	2003	Mineral Oil	STEEL	2	
999-015 Outside Maintenance	Emergency Gen	1,400 gal	1993	Oil	STEEL	2	3,149 Gal

Containment Types:

1. Sorbent materials on hard concrete floor 112.7(c)(1)(vii)
2. Concrete floor and walls 112.7(c)(1)(i)
3. Asphalt floor and concrete curb 112.7(c)(1)(ii)

Notes 1 Containment area capacity designed to contain oil plus 10%

Table 1
RELEASE/CONTAINMENT TABLE

TANK OR SYSTEM	CAUSE OF RELEASE	CREDIBLE WORST CASE VOLUME OF RELEASE	RATE OF RELEASE	RECEPTOR MEDIA AIR	WATER	LAND	SPILL PREVENTION OR RESPONSE EQUIPMENT
Waste Oil tank 952	overfill tank failure	20 gal. 1500 gal	20 GPM immediate		note 2		secondary contain and spill response kit
New Oil Tank 309	overfill tank failure	20 gal. 2000 gal.	20 GPM immediate		note 1		secondary contain and spill response kit
Main Transformer	overfill vessel failure	20 gal. 600 gal.	20 GPM immediate		note 1		secondary contain and spill response kit
Tank Truck (unload)	line disconnect tank failure	20 gal 2000 gal.	20 GPM immediate		note 1		secondary contain and spill response kit
Press Hydraulic Systems	overfill system failure	20 gal. 500-800 gal.	20 GPM immediate		note 2		secondary contain and spill response kit
Upper Compound Room (UCR)	overfill system failure	20 gal. 2000 gal.	20 GPM immediate		note 2		secondary contain and spill response kit
Lower Compound Room (LCR)	overfill system failure	20 gal. 100-600 gal.	20 GPM immediate		note 2		secondary contain and spill response kit
Tank 101	overfill tank failure	20 gal. 7500 gal.	20 GPM immediate	X	note 3		secondary contain and spill response kit

Tank 102	overfill tank failure	20 gal. 9000 gal.	20 GPM immediate	X	note 3	secondary contain and spill response kit
Tank 103	overfill tank failure	20 gal. 9000 gal.	20 GPM immediate	X	note 3	secondary contain and spill response kit
Tank 104	overfill tank failure	20 gal. 7500 gal.	20 GPM immediate	X	note 3	secondary contain and spill response kit
Tank 105	overfill tank failure	20 gal 5000 gal.	20 GPM immediate	X	note 3	secondary contain and spill response kit
Tank 106	overfill tank failure	10 gal 4500 gal.	20 GPM immediate	X	note 3	secondary contain and spill response kit
Tank 107	overfill tank failure	10 gal 7500 gal.	20 GPM immediate	X	note 3	secondary contain and spill response kit
Tank 108	overfill tank failure	10 gal 7500 gal.	20 GPM immediate	X	note 3	secondary contain and spill response kit
Tank 109	overfill tank failure	10 gal 7500 gal.	20 GPM immediate	X	note 3	secondary contain and spill response kit
Tank 110	overfill tank failure	10 gal 1500 gal.	20 GPM immediate	X	note 3	secondary contain and spill response kit
Tank 122A	overfill tank failure	10 gal 6000 gal.	20 GPM immediate	X	note 3	secondary contain and spill response kit
Emergency Generator	overfill system failure	10 gal 1400 gal.	10 GPM immediate		note 1	secondary contain and spill response kit

1. Equipped with secondary containment.
   The vapor pressure of hydraulic oil is low. Releases of oil from the tanks or the unloading area to the environment is not expected.

2. These hydraulic systems are located inside the plant where the walls and floor serve as secondary containment. Releases of oil to the environment from these systems is not expected.

3. Equipped with secondary containment.
   The vapor pressures of chemicals contained within the tanks could result in a possible release to the air.

All storage tanks are equipped with an automatic high level shut off. These devices will help prevent a spill from occurring due to tank overfilling.

The management of tanks includes weekly visual inspections to check for tank integrity. These inspections are noted on a log.

The facility had fifteen underground storage tanks at one point in time. These tanks were cleaned, filled with cement and closed in place or removed between 1989 and 1992. The

facility has an active groundwater-monitoring program to ensure that contamination, caused by these tanks when in service, does not migrate off-site.

4.2 Drum Management

The Postville facility uses 55-gallon drums for the storage of raw materials and wastes. Raw materials are stored in the flammable storage building at the southeast side of the property. Drums containing wastes are stored in the 90-day storage area adjacent to the flammable storage building.

Both the flammable storage building and the 90-day storage area are fully enclosed. There are no drains or sumps in either of these buildings.

Empty drums are stored on their sides with the bungs in them at the southwest side of the manufacturing building. Management of these drums is more fully described in the Storm water PPP.

4.3 Miscellaneous Chemical Storage

Chemicals used to support plant operations are stored in various locations at the plant site. These locations include: the quality control laboratory, the warehouse and the maintenance shop. Chemical storage in these areas of the plant is in drum or smaller quantities.

5.0 Transfer Operations

The Postville facility has a documented procedure for the transfer of materials from trucks to the designated storage tank. This procedure is attached. This procedure details the requirements for inspections, personnel assignments, safety requirements and oversight by ILNorplex employees.

6.0 Unloading Facilities

There is one location for unloading bulk chemicals and one unloading area for drummed materials at the Postville facility.

6.1 Solvent/Resin Unloading Area

The unloading area for bulk solvents and resins is located within the main manufacturing building. The area is constructed of concrete and completely enclosed, therefore, preventing the accumulation of rainwater in the containment area. The containment area is designed to hold the entire contents of a tank truck. The area is inspected as part of the unloading procedure.

6.2 Hydraulic Oil Unloading Area

The unloading area for hydraulic oil is located on the northwest side of the main manufacturing building. The area has a concrete berm where tank trucks back into during unloading. The berm is designed to contain the entire contents of the tank truck. The area is inspected as part of the unloading procedure.

6.3 Drummed Material Unloading Area

Drummed materials are received at the loading dock. The drums are lifted from the truck and placed in the warehouse. Once inside the warehouse, the drums are checked by Quality Assurance. Upon acceptance by Quality Assurance the drums are then transferred via forklift to the flammable storage building.

The receiving dock is made of concrete. There is an awning above the door opening to keep rain out of the building when trucks are being unloaded. There are no drains by the dock, and the area where the truck is parked is relatively flat. The wheels of the truck are chocked before the truck is unloaded.

7.0 Inspections and Records

The Postville facility maintains an inspection and records program designed to monitor, correct and document any actions taken by plant personnel related to storage of plant materials, maintenance of transfer piping, documentation of transfer operations and storm water drainage logs. The following is a list of the inspection and reporting forms used to document plant activities:

- Storm water Drainage Inspection: Details the procedures to use to inspect accumulated storm water in containment dikes prior to discharge. It also outlines the procedures to follow should contamination be found in the accumulated water.

- Aboveground Tank and Piping Inspection: This procedure is used to inspect aboveground piping and tankage for leaks and deterioration. This inspection is conducted by maintenance on a monthly basis.

- Material Transfer SOPs: This inspection and unloading procedure documents the requirements for ensuring that there is adequate volume in the storage tank for the material being received, that proper safety procedures are being followed, procedures for disconnecting the truck at the end of the transfer operation and the procedures for reporting spills and leaks if they were to occur.

8.0 Spill Response Procedures

8.1 General Duties and Emergency Procedures for the Emergency Response Coordinator

Whenever there is an imminent or actual emergency situation, the Emergency Response Coordinator (or his designee when the Emergency Response Coordinator is on call) must immediately:

- Activate internal facility alarms and communications systems to notify all facility personnel; and

- Notify appropriate Federal, State or local agencies with designated response roles if their help is needed.

Whenever there is a release, fire or explosion, the Emergency Response Coordinator must immediately identify the character, exact source, amount and actual extent of any released materials. He may do this by observation or review of facility records or if necessary by chemical analysis.

Concurrently, the Emergency Response Coordinator must assess possible hazards to human health or the environment that may result from the release, fire or explosion. This assessment must consider both direct and indirect effects of the release, fire or explosion (e.g., the effects of any toxic, irritating or asphyxiating gases that are generated, or the effects of any contaminated surface water run-off from water or chemical agents used to control fire and heat-induced explosions).

The Postville facility has established a contact for 24-hour emergency spill cleanup response with Enviromark in Davenport, Iowa. See **1.4 Spill Reporting** above for additional information.

If the Emergency Response Coordinator determines that the facility has had a release, fire or explosion that could threaten human health or the environment, outside the facility, he must report his findings as follows:

- If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and

- He must immediately notify the National Response Center at (800) 424-8802. This report must include:

  - Name and telephone number of reporter;
  - Name and address of facility;
  - Time and type of incident;

- Name and quantity of material(s) involved, to the extent known;
- The extent of injuries, if any; and
- The possible hazards to human health or the environment, outside of the facility.

During an emergency, the Emergency Response Coordinator must take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur or spread to other hazardous materials at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing the materials and removing or isolating materials.

If the facility stops operations in response to a fire, explosion or release, the Emergency Response Coordinator must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, wherever appropriate.

Immediately after an emergency, the Emergency Response Coordinator must provide for treating, storing or disposing of the recovered materials and wastes, contaminated soil or surface water or any other material that results from a release, fire or explosion at the facility.

The Emergency Response Coordinator must ensure that in affected area(s) of the facility:

- No waste that may be incompatible with the released material is treated, stored or disposed of until cleanup procedures are completed; and

- All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

8.2 General Spill Response Procedures

8.2.1 Containment

Containment is the first order of control.

For tank farm dikes all drain valves shall remain closed and shall not be opened without the permission of the area supervisor or his designee.

8.2.2 Notification

Upon discovery of a spill or leak and after initial containment, the following actions shall be taken, as applicable:

Personnel	Notification Requirements	Documentation and /or Action
First On Scene	Emergency Response Coordinator Plant Manager	Spill Report
Plant Manager	Emergency Response Team	Control and reporting of spill
Emergency Response Coordinator	HS&E Manager	Control, Report and supervise clean-up
HS&E Manager (if CERCLA reportable spill)	- National Response Center - State Emergency Response Commission (SERC) - Local Emergency Planning Commission (LEPC)	Spill Report

8.2.3 Sampling & Monitoring

The spilled material will be identified either through existing material safety data sheets or through analysis of a sample. Environmental media sampling of soil or surface water will be conducted as directed by the HS&E Manager. The HS&E Manager will determine if the spilled material is a hazardous waste.

The HS&E Manager will also be responsible for determining employee exposure, monitoring and sampling and employee safety.

8.2.4 Recovery

The HS&E Manager will coordinate on the spill clean up and disposal method.

After containment, notification and identification, the spilled material will be recovered either by: 1) pumping the material to a storage vessel; 2) transferring the material to a mobile holding tank; or 3) transferring the material into drums.

Residual liquid contamination will be recovered using appropriate sorbent material. Sorbent material will be placed in a waste storage drum, labeled and stored in the 90-day accumulation area.

8.2.5 Reports, Record keeping and Inspections

All records regarding the spill will be maintained in the HS&E Manager's office. These records will include, but are not limited to: Agency notification logs, Agency follow-up reports, employee exposure records and internal spill reports.

8.3 Material-Specific Response Techniques

General spill response techniques have been developed for the raw materials and support materials used at the Postville Plant.

Spill response kits for containment of surface spills (including hazardous waste) consist of the following:

- 1 ea over pack drum
- 2 ea Tyvex Suits
- 1 ea Flash light
- 1 ea 15/16" wrench
- 1 ea Siphon Pump
- 1 ea Plastic Shovel
- 2 ea Garbage bags
- 1 ea tarp
- 2 ea Bung Wrenches
- 2 ea pair Neoprene gloves
- 3 ea 5 gal. Buckets with lids
- 2 ea pair goggles
- 2 ea bags Absorbent

These spill control supplies are inventoried weekly and restocked as necessary. Kit locations are as follows: Receiving dock, still room, Hazardous Waste lean-to, Out-door Barrel storage area.

9.0 Security

The Postville facility is totally enclosed by a fence. Entrance gates to the facility are locked and a guard is on duty when the plant is not in production or is unattended. The facility also has adequate lighting to detect spills and to deter vandalism.

Visitors, contractors and other personnel are required to abide by the facility emergency evacuation procedures. The facility is equipped with an emergency evacuation alarm. If the alarm is sounded, all personnel on-site are required to assemble in the Assembly Area for further instructions. At that time a head count is performed to ensure that all personnel have exited the site.

10.0 Training Programs

The Postville facility maintains and implements a personnel training program designed to ensure that plant operating practices and procedures will prevent chemical and/or oil spills, releases or accidents from occurring. This section of the Plan identifies the standard training programs employed at the facility that are required for all. These training programs, in conjunction with the Plant's Standard Operating Procedures,

provide the mechanisms to reduce the risk to employees and/or plant property in the event of a release of hazardous chemicals.

The nature of the organic products handled at the facility require good operation control. Each supervisor is responsible to see that good operating practices maintain high standards, provide for the safety of employees and protect the environment. To achieve these objectives each employee is required to be trained and reviewed in each of the following areas:

- Hazardous Materials Communication;

- Respiratory Protection Programs;

- Operations logs and documentation;

-Safety procedures including confined space entry, electrical lockout and use and maintenance of fire extinguishers;

- Safety equipment and personal protection procedures;

- RCRA hazardous waste training;

- Storm water Pollution Prevention Plan.

In addition to the general training noted above, spill prevention briefings are held annually for all personnel involved with storage tanks and associated piping.

11.0 Container Management

11.1 Introduction

Spills are a common problem throughout industry resulting in potential employee exposures to hazardous materials and environmental contamination. A comprehensive container management program and thorough training will help ILNorplex avoid the problems and costs associated with leaks and spills from containers.

Container management practices specific to hazardous waste are covered under the Hazardous Waste Management Training.

11.2 Types of Containers

A. Drums

a. Most of the hazardous chemicals in use at the plant are received in 55-gallon drums. These drums can be made of steel, fiberboard, or plastic.

b. Steel drums are mostly used to contain flammable liquids such as solvents or liquid resins. The drums can be either open top where the entire top is removable, or closed top where two small holes or bungs are sealed with threaded caps.

c. Fiberboard drums are used to contain some powdered or granulated materials and in some cases, liquids. These drums are almost always of the open top type.

B. Carboys and Pails

a. Carboys and pails are smaller containers used mostly to contain maintenance and janitorial chemicals

C. Bags

a. Bags Paper and plastic are used in the plants to contain dry chemicals such as Dicy, and antimony trioxide.

11.3 Labeling

All containers at the plant must be labeled according to applicable regulations.

A. Hazardous Materials containers must be labeled with information that identifies the container contents in a manner that all functionally literate personnel can understand.

B. Hazardous waste containers must be labeled with the words "Hazardous Waste", a description of the waste, and a hazard class label such as Flammable Liquid or Corrosive Liquid diamond labels.

11.4 Container Receiving and Offloading

When a delivery of containers arrives at the receiving dock, the receiving personnel must inspect every container for signs of leaks, spills or other damage.

If any of these conditions exist, the container must be set aside and the condition corrected prior to placing the container in storage, or the container must be rejected.

We may assist the transporter, if needed, in plugging a leaking container that has been rejected to avoid contamination of the environment during its return shipment.

Under no circumstances should a leaking container or a damaged container with an eminent potential for leaking be placed in storage at the plant without being corrected first.

11.5 Container Transfer

A. The following steps and practices should be followed anytime a container is being transferred anywhere in the plant or on the plant grounds.

1. Check and tighten all bung caps or container lids to ensure a tight seal on all container openings.

2. Drum transfer should be done only with an approved drum cart, dolly, on a pallet with a forklift, or with a forklift equipped with a drum grabber. Drums should not be transferred by placing on the bare forks of the lift,

3. All other containers should be transferred in a manner that minimizes the potential for a container tipping.

4. Transfer of hazardous material containers from one area to another should only be via safe designated routes. For example, flammable liquids should not be transported through areas where burning or welding is taking place.

11.6 Storage

A. Storage Area Requirements

1. All hazardous materials and hazardous waste must be stored in an area equipped with impervious secondary containment and a roof or other means of preventing precipitation from contacting the containers.

2. All storage areas should be clearly marked with signs indicating the types of materials stored and all applicable precautions (i.e. "Flammable Liquids" and "No Smoking",

Trainer will identify each specific hazardous material storage area in the plant and the materials stored there including all hazardous waste storage areas.

3. Incompatible materials should be stored in separate areas or should be separated by dikes or berms if stored in the same area. This will prevent dangerous reactions between incompatible materials such as organics and oxidizers (oxidizers can cause organics to burn) in the event of a spill.

B. Container Placement in Storage Area

1. Containers should be positioned in a way that the labels can be easily read.

2. There should be adequate aisle space between rows of containers or rows of pallets holding containers, to allow for easy inspections of containers for damage, leaks, or labeling inadequacies.

3. Containers may not be stacked unless a pallet is placed between them and in any case containers should not be stacked more than 2 high.

4. Drums of flammable liquids should not be placed in a storage area exposed to heat or direct sunlight. Drums of water-based liquids should be protected from freezing.

C. Emergency Response Equipment

A fully equipped spill response kit must be kept in near proximity to each storage area. A fire extinguisher must be kept outside, but in near proximity to flammable liquid storage areas.

D. Storage Area Inspections

1. Hazardous Waste Storage Areas

Federal regulations require weekly inspection of all of these storage areas. This is covered in detail as part of the Hazardous Waste Management training.

11.7 Dispensing From Containers

A. All containers of flammable liquid must be grounded prior to dispensing or adding material to the drums.

B. Care must be taken during all dispensing to minimize the potential for spills.

C. All spills, no matter how minor, must be cleaned up immediately.

D. Particular care should be taken during the dispensing of powdered or granulated materials to minimize dust generation.

11.8 Empty Containers

A. All containers must be completely drained or emptied of their contents prior to being placed in the empty container storage area.

B. Bungs or tops on empty containers must be tightly sealed.

C. Empty drums should have some indication of what the previous contents were.

D. All empty containers should be stored in a common location that is protected from precipitation. Empty containers should not be allowed to be strewn across the plant property.

11.9 Shipping

A. All containers must be inspected prior to shipment for:

1. Proper labeling as required by DOT (see Hazardous Material Transportation Training).

2. Containers are in good condition.
   a. No severe dents, rusting, bulges, spill or drip marks.
   b. Tops or bung caps are all tightly secured.

B. ILNorplex personnel should verify that containers are properly secured on the truck before it leaves the plant.

11.10 Spill Response

A. Detailed spill response information is covered in the Spill Response Training Guide.

B. In general, the following actions can be taken to stop a container leak:

1. Roll a leaking drum so that the hole is above the liquid level line.

2. Transfer contents of leaking container to a sound container.

3. Patch holes in container.

4. Overpack the leaking container by placing it in a larger, sound container.

C. Be sure to wear all appropriate PPE when handling a leaking container (see Haz Comm. and PPE Training).

D. Be sure to make proper notifications in the event of a leaking container (see Spill Response Training).

Norplex-Micarta
BULK CHEMICAL LOADING/UNLOADING CHECKLIST

____ 1. All loading or unloading will be done during the hours from 8:00am to 4:00pm.

____ 2. Smoking and all other sources of ignition are strictly prohibited in the loading/unloading area.

____ 3. Place barrier in front of tank trunk.

____ 4. Inspect all valves on tank truck for evidence of leakage during transport. If leakage is detected, notify H S & E immediately. DO NOT PROCEED WITH TRANSFER.

____ 5. Verify the material to be transferred and correct hose connections.

____ 6. Determine receiving tank has capacity to accept to load by visual inspection of level gauge.

____ 7. Attach grounding wire to tank truck.

____ 8. Chock the wheels on tank truck.

____ 9. Driver of tank truck shall not remain in his truck, but should remain at the transfer operation at all times or as long as the hoses are charged with material.

____ 10. A Norplex-Micarta employee will be present during the transfer operation or whenever the hoses are charged with material.

____ 11. Ensure that a fire extinguisher of at least 60 BC rating is within 20 feet of the transfer area.

____ 12. Examine all valves for evidence of leakage prior to connecting transfer lines.

____ 13. Connect hoses, place drip pans under all hose connections, start transfer pumps.

____ 14. Inspect all hose connections for leakage. If leaks are detected, immediately stop pumps and direct driver to seal leaking connections before transfer is resumed.

____ 15. When transfer is complete, turn off pumps, close valves and disconnect hoses.

____ 16. Inspect valves on tank truck for signs of leakage. If any leakage is detected, instruct driver to seal leaking valves. DO NOT ALLOW TRUCK TO LEAVE UNTIL LEAKING VALVES ARE FIXED.

____ 17. Remove drip pans, ground cable, and barrier and release tank truck.

DATE_____ Norplex-Micarta EMPLOYEE_____

TANK TRUCK DRIVER_____

ABOVE GROUND TANK AND PIPING INSPECTION CHEMICAL STORAGE		
DATE:	TIME:	INSPECTOR:

CHECK	110	102	103	104	105	106	107	108	109	110	122A	952	308
TANKS													
FOUNDATION SUPPORTS													
SEAMS													
GASKETS													
VALVES													
BUNGS													
MANWAYS													
GAUGES													
PIPE CONNECTIONS													
DETERIORATION													
SPILLAGE													
PIPING AREA													
PUMP ROOM													
UPPER COMPOUNDING													
LOWER COMPOUNDING													
TREATER DIP PANS													
PRESS PIT													
BOILER ROOM													

PIPING INSPECTION INCLUDES PUMPS, METERS, FLANGE JOINTS, VALVES, VENTS, CATCH PANS AND PIPE SUPPORTS

TANK 101 – 335 RESIN 7500 GAL
TANK 102 – 422 RESIN 9000 GAL
TANK 103 – 383 RESIN 9000 GAL
TANK 104 – SANTICIZOR 7500 GAL
TANK 105 – ETHANOL 5000 GAL
TANK 106 – TOLUENE 4500 GAL
TANK 107 – ACETONE 7500 GAL
TANK 108 – DMF 7500 GAL
TANK 109 – P.M. 7500 GAL
TANK 110 – IPA 1500 GAL
TANK 122A – EPOXY RESIN
TANK 952 – WASTE OIL
TANK 308 – HYDRAULIC OIL 2000 GAL

COMMENTS

ATTACHMENT 11

HAZARDOUS WASTE MANIFESTS AND LDR NOTICES

(Six Pages)

04.24.07

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
IAD073489288	1	(800)535-5053	000126802 VES

GENERATOR

5. Generator's Name and Mailing Address
INDUSTRIAL LMNTS NORPLEX INC
665 LYBRAND DR
POSTVILLE, IA 52162-0977
Generator's Phone: (563)864-4227

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: VEOLIA ES INDUSTRIAL SERVICES — U.S. EPA ID Number: TXR000025791

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address
VEOLIA ES TECHNICAL SOLUT
4301 INFIRMARY ROAD
WEST CARROLLTON, OH 45449
Facility's Phone: (937)859-6101
U.S. EPA ID Number: OHD093945293

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ WASTE FLAMMABLE LIQUIDS, n.o.s. (METHANOL) (METHYL ETHYL KETONE), 3, UN1993, II (D001, F003, F005)	1	TT	1325	G	F003	F005	D001
						D007	D008	
	2.			4224				
	3.						7	
	4.							

14. Special Handling Instructions and Additional Information
WIP# 587446
Infotrac Contract #86072

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Scott Lovern — Signature: Scott Lovern — Month: 4 — Day: 19 — Year: 07

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Mark Minor — Signature: Mark Minor — Month: 04 — Day: 19 — Year: 07

Transporter 2 Printed/Typed Name — Signature — Month — Day — Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month — Day — Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Linda C. Davis — Signature: Linda C. Davis — Month: 04 — Day: 24 — Year: 07

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

Attachment II Page 1 of 6 DESIGNATED FACILITY TO GENERATOR

0-000-60

RNL53624

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	IAD073489288	1	1-800-468-1760	000189833 CEX

5. Generator's Name and Mailing Address
INDUSTRIAL LAMINATES
665 LYBRAND ST
POSTVILLE IA 52162
Generator's Phone: 563-864-7321

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name: Pioneer Tank Lines, Inc — U.S. EPA ID Number: MND044976113

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address
SAFETY-KLEEN SYSTEMS, INC. 000654
633 E 138TH ST
DOLTON, IL 60419
Facility's Phone: 708-225-8100
U.S. EPA ID Number: ILD980613913

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1 RQ WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE, ACETONE) 3 UN1993 PG II (D001) (ERG#128)	62	DM	30055	P	F005	F003	D001
X	2 RQ WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S. (ETHANOL, ISOPROPANOL) 4.1 UN1325 PG II (D001)(ERG#133)	01	DM	0372	P	F003	F005	D001
X	3 RQ WASTE FLAMMABLE LIQUIDS, N.O.S. (N-BUTYL ALCOHOL, TOLUENE) 3 UN1993 PG II (D001) (ERG#128)	13	DM	6825	P	F003	F005	D001
X	4 RQ WASTE SOLIDS, CONTAINING FLAMMABLE LIQUID, N.O.S. (TOLUENE, ACETONE) 4.1 UN3175 PG II (D001) (ERG#133)	04	DM	0920	P	F003	F005	D001

14. Special Handling Instructions and Additional Information: SK TRCK#108264087 0000609293

SK AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIERS AS NECESSARY

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Scott Loven — Signature — Month 04 Day 04 Year 07

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Larry Nielsen — Signature — Month 4 Day 4 Year 07

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H061	H061	H061	H061

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: M Riley — Signature — Month 4 Day 4 Year 07

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR

Attachment II Page 2 of

1)0175359 2) 0175356 3) 0175360 4) 0175357
1)2212918/2315995 2)2212934/2315996 3)2212906/2315971 4)2212932/2315972

01-26-07

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number IAD073489288	2. Page 1 of 1	3. Emergency Response Phone (800)535-5053	4. Manifest Tracking Number 000115176 VES

GENERATOR

5. Generator's Name and Mailing Address
INDUSTRIAL LIMITS NORPLEX INC
665 LYBRAND DR
POSTVILLE, IA 52162-0977
Generator's Phone: (563)864-4227

Generator's Site Address (if different than mailing address)

6. Transporter 1 Company Name ~~TRI-STATE MOTOR TRANSIT CO.~~ VEOLIA ES INDUSTRIAL SERVICES
U.S. EPA ID Number ~~HAD095038998~~ TXR000025791

7. Transporter 2 Company Name
U.S. EPA ID Number

8. Designated Facility Name and Site Address VEOLIA ES TECHNICAL SOLUT
4301 INFIRMARY ROAD
WEST CARROLLTON, OH 45449
Facility's Phone: (937)859-6101
U.S. EPA ID Number OHD093945293

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt/Vol.	13. Waste Codes		
X	1. RQ WASTE FLAMMABLE LIQUIDS, n.o.s. (METHANOL) (METHYL ETHYL KETONE), 3, UN1993, II (D001,F003,F005)	1	TT	1525	G	D001 F003	D007 F005	
	2.							
	3.							
	4.							

14. Special Handling Instructions and Additional Information
LINE 1-587446
Infotrac Contract #86072

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable International and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Scott Lovell
Signature
Month: 01 Day: 23 Year: 07

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Mark Minor
Signature
Month: 01 Day: 23 Year: 07

Transporter 2 Printed/Typed Name
Signature
Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H141			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Linda L. Jarvis
Signature
Month: 01 Day: 24 Year: 07

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. DESIGNATED FACILITY TO GENERATOR

54474-R5732 SAFETY-KLEEN 03/07/07 PAGE: 1
OCATION: 60 LDR NOTIFICATION FORM 15:05:27

ENERATOR NAME: INDUSTRIAL LAMINATES MANIFEST NO.:
OR SALES SERVICE NO.: 0

CUST#: 0000-6092-93

U.)ANT TO 40 CFR 268.7(A), I HEREBY NOTIFY THAT THIS SHIPMENT CONTAINS
ASTE RESTRICTED UNDER 40 CFR PART 268 LAND DISPOSAL RESTRICTIONS (LDR).

A. GENERAL WASTE NOTIFICATION

DR FORM LINE NO.: 1 MANIFEST PAGE/LINE# 01/001 SK PRFL NO.: 0002315995 0000

PQ SKDOT#: 0175359

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY)
005 F003 D001 LIQUID >= 10% TOC

REATABILITY GROUP: NONWASTEWATERS

ASTE CONSTITUENT NOTIFICATION:
EGEND
JMBER CONSTITUENT
---
84 METHYL ETHYL KETONE
31 TOLUENE
1 ACETONE
7 N-BUTYL ALCOHOL

DR FORM LINE NO.: 2 MANIFEST PAGE/LINE# 01/002 SK PRFL NO.: 0002315996 0000

PQ SKDOT#: 0175356

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY)
003 F005 D001 LIQUID >= 10% TOC

REATABILITY GROUP: NONWASTEWATERS

ASTE CONSTITUENT NOTIFICATION:
EGEND
JMBER CONSTITUENT
---
3 TOLUENE
1 ACETONE

DR FORM LINE NO.: 3 MANIFEST PAGE/LINE# 01/003 SK PRFL NO.: 0002315971 0000

PQ SKDOT#: 0175360

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY)
003 F005 D001 LIQUID >= 10% TOC

REATABILITY GROUP: NONWASTEWATERS

ASTE CONSTITUENT NOTIFICATION:
EGEND
JMBER CONSTITUENT
---
84 METHYL ETHYL KETONE
31 TOLUENE
1 ACETONE
7 N-BUTYL ALCOHOL

Attachment 11 Page 4 of 6

(CONTINUED ON NEXT PAGE)

3Q#: 0 LOC: 60 TERR: REF#: 0 SW:

54474-R5732 SAFETY-KLEEN 03/07/07 PAGE: 2
OCATION: 60 LDR NOTIFICATION FORM 15:05:27

OR FORM LINE NO.: 4 MANIFEST PAGE/LINE# 01/004 SK PRFL NO.: 0002315972 0000

PQ SKDOT#: 0175357

EPA WASTE CODES & LDR SUBCATEGORIES (IF ANY)
? F005 D001 LIQUID >= 10% TOC

REATABILITY GROUP: NONWASTEWATERS

ASTE CONSTITUENT NOTIFICATION:

EGEND UMBER	CONSTITUENT
84	METHYL ETHYL KETONE
31	TOLUENE
1	ACETONE
7	N-BUTYL ALCOHOL

N O T E S

XP NOTICE: THIS LDR EXPIRES ON 12/31/2007

E ATOR'S AUTHORIZED SIGNATURE | Scott Lovan HSE NAME & TITLE (PRINTED OR TYPED) | 04/07/2007 DATE

EQ#: O LOC: 60 TERR: REF#: O SW:

TOP COPY: GENERATOR MIDDLE COPY: FACILITY BOTTOM COPY: TRANSFE

ORDER # 408289

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	IAD734869288	1	800-535-5053	001937481 JJK

5. Generator's Name and Mailing Address
IL-NORPLEX
665 LYBRAND ST.
POSTVILLE, IA 52162

Generator's Site Address (if different than mailing address)

Generator's Phone: 563 864-7321

6. Transporter 1 Company Name: PIONEER TANK LINES INC. — U.S. EPA ID Number: MND044176113

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address
SYSTECH ENVIRONMENTAL CORPORATION
1420 S. CEMENT ROAD
FREDONIA, KS 66736

U.S. EPA ID Number: KSD980633259

Facility's Phone: 620-378-4451

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
X	1. RQ, WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE, ACETONE) 3, UN1993, PG II, (RQ=100), (ERG#128)	69	DM	3[illegible]	P	D001	F003	F005
X	2. RQ, WASTE FLAMMABLE LIQUIDS, N.O.S. (N-BUTYL ALCOHOL, TOLUENE) 3, UN1993, PG II, (RQ=100), (ERG#128)	09	DM	4[illegible]	P	D001	F003	F005
X	3. RQ, WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S. (ISOPROPANOL, ETHANOL) 4.1, UN1325, PG II, (RQ=100), (ERG#133)	[illegible]	DM	[illegible]		D001	F003	F005
X	4. WASTE SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S. (TOLUENE, ACETONE) 4.1, UN3175, PG II, (ERG#133)	[illegible]	DM	[illegible]	P	D001	F003	F005

14. Special Handling Instructions and Additional Information
1. VAR3G127 SOLVENT 2. VAR3G170 WATER 3. VAR3G154 BOTTOMS 4. VAR3G197 DEBRIS
PLACARDS PROVIDED BY CARRIER.
**** ER CALLER MUST IDENTIFY UNIVAR USA AS REGISTRANT ****

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Scott Loven — Signature: [signature] — Month 5 Day [illegible] Year 07

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: [illegible] — Signature: [signature] — Month [illegible] Day [illegible] Year [illegible]
Transporter 2 Printed/Typed Name — Signature — Month Day Year

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name — Signature — Month Day Year

GENERATOR | INT'L | TRANSPORTER | DESIGNATED FACILITY

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete. GENERATOR'S INITIAL COPY

ATTACHMENT 12

HAZARDOUS WASTE LOG

(Two Pages)

HAZARDOUS WASTE LOG

	DRM #	DATE	DESCRIPTION	WASTE STREAM	DATE OUT
488#	#65	4-5-2007	Resin Solution	F005	
470#	#66	4-9-2007	Resin Solution	F005	
466#	#67	4-10-2007	Resin Solution	F005	
496#	#68	4-9-2007	Resin Solution	F005	
536#	#69	4-11-2007	Resin Solution	F005	
580#	#70	4-5-2007	Melamine + Water	F005	
198#	#71	4-2-2007	RAGS	F005	
254#	#72	3-15-2007	RAGS	F005	
446#	#73	4-11-2007	Resin Solution	F005	
544#	#74	3-22-2007	Resin Solution	F005	
504#	#75	4-13-2007	Resin Solution	F005	
476#	#76	4-13-2007	Resin Solutions	F005	
416#	#77	4-5-2007	Melamine + Water	F005	
550#	#78	4-2-2007	Melamine + Water	F005	
498#	#79	4-5-2007	Resin Solution	F005	
462#	#80	4-5-2007	Resin Solution	F005	

Shipped out 80 Drums on 5-1-2007

69 Drums Resin Waste 34,006#

09 Drums Resin Water 4,550#

02 Drums RAGS Waste Debris 452#

Manifest Document # 001937481SJK

39,008#

HAZARDOUS WASTE LOG

	DRM #	DATE	DESCRIPTION	WASTE STREAM	DATE OUT
390#	#65-1463	3-13-2007	Resin Solution	F005	
620#	#66-1464	3-6-2007	Resin Solution	F005	
540#	#67-1465	3-2-2007	Resin Solution	F005	
424#	#68-1466	3-20-2007	Resin Solution	F005	
556#	#69-1467	1-24-2007	Resin Solution	F005	
536#	#70-1468	2-17-2007	Resin Solution	F005	
510#	#71-1469	2-13-2007	Resin Solution	F005	
308#	#72-2460	1-24-2007	RAGS	F005	
504#	#73-1470	2-20-2007	Resin Solution	F005	
440#	#74-1471	2-16-2007	Resin Solution	F005	
470#	#75-1472	2-16-2007	Resin Solution	F005	
500#	#76-6743	2-16-2007	Melamine + Water	F005	
462#	#77-1473	2-23-2007	Resin Solution	F005	
500#	#78-1474	2-13-2007	Resin Solution	F005	
372#	#79-1406	2-28-2007	STILL Bottoms	F005	
558#	#80-6744	2-27-2007	Melamine + Water	F005	

Shipped out 80 Drums on ~~4~~ 4-4-2007

13 Drums Melamine + Water 906^s 6,825#

62 Drums Resin Solution 918^s 30,055#

04 Drums RAGS 932^s 920#

01 Drum STILL Bottoms 934^s 372#

[redacted]

0001898333CEX

36,172# 6 Cuf

PS

Attachment 12 Page 2 of 2

ATTACHMENT 6 - DOCUMENT CONTROL SHEET

DOCUMENT CONTROL CHECK SHEET

Media:

Air	RCRA	Water	Other
	X		

Date of Inspection: 05/17/07

Facility/Site Name and Location: Industrial Laminates-Norplex, Inc. 665 Lybrand St., Postville, IA 52132

IA	KS	MO	NE
X			

Document		Yes	No	NA
Final Report w/attachments	~~117~~ 85 Pages	(✓)	( )	( )
Field Sheets	∅ Pages	( )	( )	(✓)
Chain-of-Custody Records	∅ Pages	( )	( )	(✓)
Field Notes	7 Pages	(✓)	( )	( )
Analytical Data Sheets	∅ Pages	( )	( )	(✓)
Photographic Negatives	∅ Pages	( )	( )	(✓)
Photographs (not included w/report)	∅ Pages	( )	( )	(✓)
Pre-inspection Packet	∅ Pages	( )	(✓)	( )
Other Documents (list below)		(✓)	( )	( )
CD with photographs	1 Sleeve ~~Pages~~			
	Pages			
	Pages			

(Note: If additional space is needed to list specific documents, use the reverse side of this page.)

CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

Activity Leader's Signature

06/07/07
Date Signed

Client:

Project No.: Industrial Laminates / Norplex

Date: 5/17/07

Page: 1 of 7

Made by: Ann Galbraith

Checked by:

Preliminary: Final

9:05 Am – Arrived at IL Norplex and announced inspection to receptionist. She asked Scott Loven to meet me in lobby

– went to his office to begin; presented credentials & explained procedures; 3007, 1001, 1002, Confidentiality Notice

Wastes

Resin & solvent (haz) – wash from cleaning up when changing resin types (varies w/ solvent)

Melamine water (haz) — melamine resin w/ water; keep separate

Rags w/ solvent (haz) —

Still bottoms (haz) — from distillation of solvents } S-K

hydraulic oil (used oil) in all presses; used oil if pump out pits }

parts washer (haz) — in maintenance

light bulbs (UW) — UW

occassionally — resin (haz) hardens & is unusable; handled as separate waste stream

no other UW

– all waste managed as <90 day; typically ship waste every month

- Completed multi-media checklist & basic facility info on checklist

all resin & solvent stored in ASTs in tank farm; piped to mixing room tanks; 8 different combinations
- mix goes into dip pan & paper or cloth is rolled through pan & directly into an oven

- when clean out dip pans, use various solvents (ethanols, acetone) to clean pan & rollers; pump out left-over solvents into <90 day hw storage drum;

- central <90 day area for several lines; also drum of hw rags

1st area I observed, rag drum dated 5/11/07 and 1 drum for Melamine scrap dated 5/16/07; open as workers adding material
- melamine scrap can't go through still
- melamine wash goes to still

When operators get full drum, take to <90 day storage @ still room; distill solvent off & once drum w/ resin is no longer usable, becomes scrap drum & is cleaned off & moved to outside <90 day storage
- fill 2-3 drums per day of solvent wash & scrap

- still room:

2 drums	epoxy wash	5/15/07 & 5/7/07	
2 drums	phenolic wash	5/9/07 & 5/4/07	
1 drum	phenolic wash	4/24/07	1 drum still bottom 5/16/07
" "	" "	5/15/07	
1 "	scrap	5/14/07	
1 "	epoxy wash	5/15/07	1 drum solvent rags 5/8/07 - ≈1/4 full
1 "	phenolic wash	4/13/07	

- run still ~~daily~~ every couple of days

1 drum for phenolic wash; solvent has been distilled; resin in bottom; drum will be reused & is dated 5/6/07

4 drums of waste on pallet, labeled, ready to move to outside <90 day storage
5/7/07 } scrap
5/5/07 }
4/23/07 - rags
5/8/07 melamine scrap

Client:

Project No.: Industria/Laminates/Norplex Date: 5/17/07

Made by: Ann Galbraith

Checked by:

Preliminary: Final

- accumulate ~80 drums in a month & ship monthly; stored in <90 day haz waste storage

- also generate contaminated groundwater from old UST solvent release; pump out water & manage as haz waste; shipped off by tanker

18 pallets w/ 4 drums each in area
- oldest drum: 3/21/07

3 tote tanks of well water 5/7/07 - 2
4/30/07 - 1

back inside - another <90 day storage area w/ 2 drums
1 drum anhydrid waste 5/11/07
1 drum epoxy waste 5/7/07

Maintenance

1 S-K parts washer;

Used oil tank (UST) in secondary containment pit; pumped out by S-K
1500 gal

1 drum for used oil adjacent to tank w/ 4 used oil filters on top
- drum labeled
- filters not punctured; crushed and put in drum

UW lamps

1 box for 4' ~20 silver - not labeled, or closed

Cardboard containers w 4' - 15 silver in smaller, ~30 silver in larger, not labeled or closed
1 box (full) 8' - closed, not labeled
1 cardboard tube 8' ~50 lamps, not closed or labeled

- silver & green mixed together

- 5 containers total not labeled
- 4 containers not closed

> repeat violations from 2003 CEI

Client:
Project No.: Industrial Laminates / Norplex
Date: 5/17/07

Page: 4 of 7
Made by: Ann Calbert
Checked by:
Preliminary: Final

Records Review - began with manifests
- Requested haz and non-haz

Note: per Scott Loren, haz waste shipped monthly

- 5/1/07 - #001937481 JJK — HOG1 (all) fuel blend
  Trans: Pioneer Tank Lines Inc.
  TSD: Systech Environmental Corp (cement kiln)
  Fredonia, KS - fuel blended; cement kiln fuel
  Resin Solution (wash) — 69 drums RQ Waste Flammable Liquid, N.O.S. (Toluene, Acetone) D001, F003, F005 — 34,006 lb
  Melamine (resin) wastes — 9 drums RQ waste Flammable Liquid, N.O.S. (n-butyl alcohol, toluene) D001, F003, F005 — 4,550 lb
  Rags (waste debris) — 2 drums Waste Solids containing Flammable Liquid (Toluene, Acetone) D001, F003, F005 — 752 lb

- 4/19/07 #000126802 VES — H141
  RQ waste Flammable Liq N.O.S. (Methanol, MEK) D001, F003, F005, D007, D008
  Trans: Veolia ES Industrial Services
  TSD: Veolia ES Technical Solutions (formerly Onyx) West Carrollton, OH
  - Contaminated groundwater
  - 1 tanker, 1,375 gal

- 1/23/07 #000115176 VES 1,525 gal

- 4/4/07 # 000189833 CRX → LDR form for this shipment; — HOG1 (all) fuel blend
  Trans: Pioneer Tank Lines Inc.
  TSD: Safety-Klean, Dolton, IL
  Resin Sln. — 62 drums RQ Waste Flammable Liq (Toluene, Acetone) 30,055 lb D001, F003, F005
  still bottoms — 1 drum RQ Waste Flammable Liq (Ethanol, Isopropanol) 372 lb D001, F003, F005
  melamine wastes — 13 drums " " (n-butyl alcohol, Phenol) 4,825 lb
  rags — 4 drums RQ Waste Solids containing Flammable Liq (Tolu, Acetone) 920 lb

- 3/1/07 000189660 CRX, S-K, Dolton (LDR)
- 3/27/07 Non haz bill of lading 64283 to S-K, LaCrosse, WI
  - Used oil and water mixture (vac truck) 2,700 gal

- 2/16/07 ~~#~~ 000189403 CRX — regular waste streams plus 1 drum fuel oil (300 lb) & 16 drums non-reg. liquid (LDR)
  Tri-State Motor Transit Co
  S-K Dolton
  2 drums still bottoms (802 lb)

Client:

Project No.: Date: 5/17/07

Industrial Laminates/Norplex

Made by: Ann Galbraith

Checked by:

Preliminary: Final

— 3/5/07 #000370582 SKS — LDR attached

S-K to LaCrosse, WI

— Waste combustible liq (Petroleum naphtha) (high flash - 150°F) — 1 drum, 25 gal — D039 (underlying recycled

~~— 3/1/07 #001896610 CRX~~ AMG

— 1/15/07 #001689615 JJK — LDR — H061 (all)

Trans 1: Univar

Trans 2: Schibar Truck Co. — includes 1 drum still bottoms (382 lb)

TSD: Systech, Fredonia, KS

~~—~~ AMG

— 12/4/06 #1001967024 JJK (no rags) Ø — H061

Univar (2 drums still bottoms)

Lin Mar Trucking — Resin soln. 20

Systech — melamine soln. 6

— 12/20/06 #000116402 CRX (LDR)

Pioneer Tank Lines

S-K, Dolton IL

Note: One time notification for LDR for waste to Systech on 11/6/06

— 10/11/06 #001615249 JJK (LDR)

— Tri-State Motor Transit

— S-K, Smithfield, KY

66 — Resin soln (32,467 lb)

1 — still bottoms (698 lb)

11 — melamine water (6,152 lb)

2 — Rags (540 lb)

— 11/9/06 — 008223471 CRX (LDR)

S-K parts washer solvent — 23 gal (D039) — H141

LaCrosse, WI

— 11/7/06 # 001799337 JJK (LDR)

Pioneer Tank Lines Inc — 65 Resin (31,586) 2 rags (628)

S-K, Smithfield, KY — 3 still bottoms (1,378)

10 - melamine (5,285)

Client:

Project No.: Industrial Laminates / Norplex

Date: 5/17/07

Made by: Ann Galbraith

Checked by:

Preliminary: Final

- 10/11/06 – groundwater 1,820 gal
- 9/20/06 – 001615136 JJK – no still bottoms (LDR)
  Haz-mat Env. Group Inc
  S-K, Smithfield, KY
- 8/22/06 parts washer solvent 20 gal
- 8/10/06 drum waste to S-K, KY
- 7/19/06 gw (3,354 gal)
- 7/18/06 drum waste to S-K, KY
- 4/14/06 drum waste " "
- 3/16/06 S-K, aqueous parts washer solution 20 gal, non-regulated
  ↳ to Dalton
- 4/24/06 – gw 1,878 gal
- 5/18/06 – ~~Lam Melamine waste, 8 drums 4,300 lb~~ (LDR)
  ↳ ~~S-K, KY~~ drum waste, S-K, KY

4/12/06 – drum waste to S-K, KY (LDR)
3/24/06 – drum waste " " (LDR)
2/16/06 – drum waste " "
1/20/06 – " "
12/7/05 – S-K parts cleaner, non-reg 16 gal, Dalton
11/18/05 – GW 1,450 gal
12/20/05 – drum waste, S-K, KY (LDR)
11/10/05 – " " "
↳ trans by Clean Streams, Munster, IN (LDR)
10/19/05 – drum waste, S-K, KY (LDR)
↳ Pioneer Tank Lines
10/11/05 – gw 2,110 gal
9/15/05 – S-K parts washer soln., 16 gal, non-Reg. (aqueous)
" " 65 gal, " (aqueous)
9/9/05 – drum waste (LDR)
↳ Tri-State to S-K, KY
8/9/05 – drum waste (LDR)
↳ Tri-state Motor Transit to S-K, KY
7/13/05 – gw, 1,775 gal
↳ Onyx Env. to Onyx

– 8 more manifests in 2005

training

- reviewed training materials & test slides; description of initial and continuing training
- reviewed list of job titles and descriptions
  - list of those filling positions
- reviewed training sign-in sheets for 2006

2006 training: William Evans (last in 2004)
Earl Gibson last 2006
Marty Miller last 2006 (last 2003)

Used Oil

3/27/07 - Used oil/water; vac by S-K
- 2,700 gal
- to S-K, LaCrosse, WI

1/19/07 — same as 3/27/07

1/12/07 - 2,800 gal; rest same as 1/19/07

1/9/07 - 2,800 gal .. 1/19/07

1:20 - lunch break
2:25 - returned from lunch to complete records review
- Scott Loven made copies I requested and provided these

1. documentation of last shipment of UW lamps; where do they go? bill (invoice) from Retrofit Recycling 7/10/06 for UW shipment
2. still: vent? No ~~permitted~~! Not a process vent
- what is facility VOC emission per year? see pre-inspection form
~~3. Waste profiles — who maintains?~~
4. How many <90 day areas total?

744'
38 >4'
8 MIU
10# batteries


CAUTION
ATTACH
GROUNDING
WIRE CLIPS
HAZARDOUS
WASTE
ACCUMULATION
040444
HAZARDOUS
WASTE
5-16-07
STILL BOTTOMS
HAZARDOUS
WASTE 5-8-07
SCRAP RAGS
5-15-07
FLAMMABLE LIQUID
3
HAZARDOUS
WASTE 5-21-07
EPOXY WASH
FLAMMABLE LIQUID
3


198
DISTILLED PHENOLIC PUMP
OPERATOR WARNING
198


FLAMMABLE LIQUID
3
HAZARDOUS
WASTE 4.19.07
MELAMINE SCRA
HAZARDOUS
WASTE 5-3-07
SCRAP
HAZARDOUS Waste
Resin Solution
5-2-2007


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